

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

VALENTIA VILLETTI and FAIZA JIBRIL, M.D.,

Plaintiffs,

Index No.
18 Civ. 10200 (VSB)

-against-

GUIDEPOINT GLOBAL, LLC,

Defendant.

- - - - - x

One Battery Park Plaza
New York, New York

November 14, 2019
2:16 p.m.

CONTINUED EXAMINATION BEFORE TRIAL of
VALENTIA VILLETTI, a Plaintiff herein, taken
by DAVID J. GRECH, in the above-entitled
action, held at the above time and place,
pursuant to Order, taken before LEAH MILLER, a
Shorthand Reporter and Notary Public within
and for the State of New York.

MAGNA LEGAL SERVICES
(866) 624-6221
www.MagnaLS.com

<p>1 2 APPEARANCES: 3 4 LICHTEN & BRIGHT, P.C. 5 Attorneys for Plaintiffs 6 387 Park Avenue South 7 5th Floor 8 New York, New York 10016 9 646-588-4872 BY: STUART LICHTEN, ESQ. slichten@lichtenandbright.com</p> <p>10 11 GORDON & REES SCULLY MANSUKHANI 12 Attorneys for Defendant One Battery Park Plaza 28th Floor New York, New York 10004 212-453-0702 BY: DAVID J. GRECH, ESQ. dgrech@gordanrees.com</p> <p>13 14 15 16 17 18 19 20 21 22 23 24 25 GUIDEPOINT GLOBAL, LLC Attorneys for Defendant 675 Avenue of the Americas 2nd Floor New York, New York 10010 212-812-9511 BY: CATHERINE SMITH, ESQ. csmith@guidepoint.com</p> <p>ALSO PRESENT: DAHN LEVINE - LAW FIRM ASSOCIATE</p>	<p>Page 2</p> <p>1 2 V. VILLETTI 3 VALENTIA VILLETTI, the 4 Witness herein, having been first duly 5 sworn by a Notary Public of the State of 6 New York, was examined and testified as 7 follows: EXAMINATION BY MR. GRECH: Q. State your name for the record, please. A. Valentia Villett. Q. State your address for the record, please. A. 162 East 61st Street, Unit 1B, New York, New York 10065. Q. Good afternoon, Ms. Villett. A. Good afternoon. Q. It's been a while. So I'm just going to go through our instructions again. Same rules apply. If you have any questions about the instructions or as we go along, just ask me, ask Stuart, and we will stop and address it. Again, David Grech with the law</p> <p>Page 3</p> <p>1 2 STIPULATIONS 3 4 IT IS HEREBY STIPULATED AND AGREED by and 5 between the attorneys for the respective 6 parties herein, that filing, sealing and 7 certification be and the same are hereby 8 waived. 9 IT IS FURTHER STIPULATED AND AGREED 10 that all objections, except as to the form of 11 the question shall be reserved to the time of 12 the trial. 13 IT IS FURTHER STIPULATED AND AGREED 14 that the within deposition may be signed and 15 sworn to before any officer authorized to 16 administer an oath, with the same force and 17 effect as if signed and sworn to before the 18 Court and that a copy of this examination 19 shall be furnished without charge to the 20 attorney representing the witness testifying 21 herein.</p>
	<p>Page 4</p> <p>1 2 V. VILLETTI 3 VALENTIA VILLETTI, the 4 Witness herein, having been first duly 5 sworn by a Notary Public of the State of 6 New York, was examined and testified as 7 follows: EXAMINATION BY MR. GRECH: Q. State your name for the record, please. A. Valentia Villett. Q. State your address for the record, please. A. 162 East 61st Street, Unit 1B, New York, New York 10065. Q. Good afternoon, Ms. Villett. A. Good afternoon. Q. It's been a while. So I'm just going to go through our instructions again. Same rules apply. If you have any questions about the instructions or as we go along, just ask me, ask Stuart, and we will stop and address it. Again, David Grech with the law</p> <p>Page 5</p> <p>1 2 STIPULATIONS 3 4 IT IS HEREBY STIPULATED AND AGREED by and 5 between the attorneys for the respective 6 parties herein, that filing, sealing and 7 certification be and the same are hereby 8 waived. 9 IT IS FURTHER STIPULATED AND AGREED 10 that all objections, except as to the form of 11 the question shall be reserved to the time of 12 the trial. 13 IT IS FURTHER STIPULATED AND AGREED 14 that the within deposition may be signed and 15 sworn to before any officer authorized to 16 administer an oath, with the same force and 17 effect as if signed and sworn to before the 18 Court and that a copy of this examination 19 shall be furnished without charge to the 20 attorney representing the witness testifying 21 herein.</p>

<p style="text-align: right;">Page 6</p> <p>1 V. VILLETTI 2 transcript, just let me finish the 3 question and then you can respond. 4 If you need a break at any time, 5 just let us know, let me know, let 6 Mr. Lichten know, and we will 7 accommodate that. All that we would 8 ask is that if there is a question 9 pending at that point, that you answer 10 the question and then we will move on 11 and take your break.</p> <p>12 Do you have any questions about 13 the questions --</p> <p>14 A. No.</p> <p>15 Q. -- about the instructions, 16 rather. Okay. All right.</p> <p>17 MR. GRECH: Could we mark 18 this as H, please?</p> <p>19 - - -</p> <p>20 (Whereupon, Defendant's 21 Exhibit H, an employee agreement, 22 was marked for identification.)</p> <p>23 - - -</p> <p>24 Q. Ms. Villette, I'm showing you 25 what's been marked as Defendant's</p>	<p style="text-align: right;">Page 8</p> <p>1 V. VILLETTI 2 specifically Article 5, Section A, 3 nondisclosure. 4 And, Ms. Villette, were you 5 aware that during your employment with 6 Guidepoint and for a period thereafter, 7 you would be prohibited from disclosing 8 certain information as set forth in 9 Article 5? 10 A. Yes. 11 Q. And were you aware during the 12 course of your employment and for some 13 time thereafter, your use of 14 proprietary information of Guidepoint 15 would be limited, as provided in this 16 contract? 17 A. Yes. 18 Q. On page three, Article 7, same 19 question: You are aware during the 20 course of your employment with 21 Guidepoint and for two years 22 thereafter, you're under an obligation 23 not to disparage Guidepoint? 24 A. Yes. 25 Q. Do you recall a conversation you</p>
<p style="text-align: right;">Page 7</p> <p>1 V. VILLETTI 2 Exhibit H for purposes of these 3 depositions. If you could just take a 4 moment to look at Exhibit H. And let 5 us know when you have had that 6 opportunity (handing). 7 A. (Witness complied). 8 Q. You had a chance to look at H? 9 A. Yes. 10 Q. Do you know what H is? 11 A. Yes. 12 Q. You recognize it? 13 A. Yes. 14 Q. And what is it? 15 A. It's the employment agreement 16 that I signed with Guidepoint. 17 Q. And this was the agreement you 18 signed effective September 11, 2017? 19 A. Correct. 20 Q. And on the last page of the 21 agreement, it was signed on behalf of 22 Guidepoint by Albert Sebag? 23 A. Yes. 24 Q. Ms. Villette, if we could turn 25 to page 2 of the employment agreement,</p>	<p style="text-align: right;">Page 9</p> <p>1 V. VILLETTI 2 had with Dr. Jibril after your 3 termination from Guidepoint? 4 A. You would have to be more 5 specific. 6 Q. Immediately after your 7 termination from Guidepoint, your first 8 conversation with Dr. Jibril after your 9 termination from Guidepoint. 10 A. I can't recall the specifics. 11 Q. You recall speaking to her about 12 Albert and his girlfriend? 13 A. I can't recall. 14 Q. Do you recall speaking to her 15 about the hierarchy of the company? 16 A. I can't recall. 17 Q. Do you recall speaking to her at 18 that point about how the hierarchy of 19 the company mistreated women? 20 A. I don't recall. 21 Q. One of your allegations in this 22 case is that Guidepoint, as a company, 23 mistreated you based upon your gender, 24 correct? 25 A. Correct.</p>

<p style="text-align: right;">Page 10</p> <p>1 V. VILLETTI 2 Q. And specifically Mr. Sebag? 3 A. Yes. 4 Q. Mr. Sebag signed your employment 5 agreement on behalf of the company, 6 correct? 7 A. Yes. 8 Q. In September 2017, when he 9 signed that agreement, did he express 10 to you anything that you might 11 interpret as being discriminatory 12 against women? 13 A. I don't understand the question. 14 Q. September 2017 -- 15 A. Uh-huh. 16 Q. -- when you're first coming on 17 board to Guidepoint -- 18 A. Yes. 19 Q. -- did Mr. Sebag do anything 20 that made you feel that he had animus 21 towards women? 22 A. I don't recall. 23 Q. Okay. 24 MR. GRECH: Can we mark this 25 as I, please?</p>	<p style="text-align: right;">Page 12</p> <p>1 V. VILLETTI 2 A. (Witness complied). 3 Q. Have you had a chance to review 4 Exhibit I? 5 A. Yes. 6 Q. And do you recognize it? 7 A. Yes. 8 Q. And what is it? 9 A. It's an employment handbook. 10 Q. Is it Guidepoint's employment 11 handbook? 12 A. It appears so, yes. 13 Q. Do you recall receiving this 14 handbook when you were employed by 15 Guidepoint? 16 A. Not exactly. But, yes, I'm sure 17 I did. 18 Q. Okay. And if we can look at 19 Exhibit J. Take a moment to look at J. 20 A. (Witness complied). 21 Q. Do you recognize J? 22 A. Yes. 23 Q. What's J? 24 A. It's a receipt for the employee 25 handbook.</p>
<p style="text-align: right;">Page 11</p> <p>1 V. VILLETTI 2 - - - 3 (Whereupon, Defendant's 4 Exhibit I, employment policies, 5 was marked for identification.) 6 - - - 7 (Whereupon, Defendant's 8 Exhibit J, a receipt for employee 9 handbook, was marked for 10 identification.) 11 - - - 12 Q. Ms. Villetti, we are showing you 13 what's been marked -- 14 - - - 15 (Whereupon, a discussion was 16 held off the record.) 17 - - - 18 Q. We are showing you what's been 19 marked as Defendant's Exhibits both I 20 and J for the purposes of these 21 depositions. If you could just -- and 22 they work together. 23 So if you could just look at I 24 and J together and let me know when you 25 have had a chance to do so (handing).</p>	<p style="text-align: right;">Page 13</p> <p>1 V. VILLETTI 2 Q. It's an acknowledgement that you 3 received the employee handbook? 4 A. Yes, correct. 5 Q. Okay. And in -- the text in 6 Exhibit J, the receipt, you see the 7 caution there that I understand that 8 Guidepoint is an at-will employer. And 9 as such, employment with Guidepoint is 10 not for a fixed term or definite period 11 and may be terminated at the will of 12 either party with or without cause and 13 without prior notice. 14 Do you see that? 15 A. Yes. 16 Q. And you were aware when you came 17 on board with Guidepoint that your 18 employment was at will? 19 A. Yes. 20 Q. And do you recall your testimony 21 during the first part of your 22 deposition where one of your concerns 23 had been that an employee was let go 24 without consulting with her team; do 25 you remember that?</p>

<p style="text-align: right;">Page 14</p> <p>1 V. VILLETTI 2 A. Yes. 3 Q. Was that included in any of the 4 guidance given to you in the employee 5 handbook that your termination was 6 dependant upon consulting with your 7 team? 8 A. No. 9 Q. If you could go back to Exhibit 10 I, please, the employment policies. 11 And specifically, it's page 11 of the 12 document, the section entitled 13 procedures for reporting harassment or 14 discrimination. 15 Do you see that section? 16 A. Yes. 17 Q. Paragraph 1 reads Guidepoint 18 encourages but does not require 19 individuals who believe they are being 20 harassed or are subjected to 21 discrimination or who are aware of such 22 conduct to promptly tell the offender 23 that his or her behavior is unwelcome 24 and then ask that it's stopped. 25 Do you see that?</p>	<p style="text-align: right;">Page 16</p> <p>1 V. VILLETTI 2 Q. And did you ever tell Mr. Rutwik 3 that certain behavior of his you had 4 considered harassing or discriminatory? 5 A. Yes. 6 Q. And did you ever tell Mr. Sebag 7 the same thing? Did you tell him that 8 you had considered any of his conduct 9 harassing or discriminatory? 10 A. I didn't have the chance. 11 Q. And why did you not? 12 A. The CEO's often not in the 13 office. And when he is, he is not 14 readily available to employees. So I 15 did that through my supervisor. 16 Q. And who was your supervisor 17 again? 18 A. Bouker Pool. 19 Q. So you told Mr. Pool that 20 certain conduct of Mr. Sebag you 21 considered harassing or discriminatory? 22 A. Yes. 23 Q. And do you recall what you 24 specifically reported to Bouker; what 25 was the conduct that you complained</p>
<p style="text-align: right;">Page 15</p> <p>1 V. VILLETTI 2 A. Yes. 3 Q. And you're aware of that 4 procedure when you worked at 5 Guidepoint? 6 A. I can't recall. 7 Q. You can't recall if you were 8 aware of it? 9 A. At the time, yes. 10 Q. You cannot recall if you were 11 aware at the time? 12 A. Yes. 13 Q. Okay. Thank you. 14 And you have made allegations of 15 gender discrimination here, correct? 16 A. Yes. 17 Q. And who would be the offenders 18 of the gender discrimination that's 19 against you at Guidepoint? 20 A. It would be Mr. Sebag and Rutwik 21 Ghodadra. 22 - - - 23 (Whereupon, a discussion was 24 held off the record.) 25 - - -</p>	<p style="text-align: right;">Page 17</p> <p>1 V. VILLETTI 2 about about Mr. Sebag? 3 A. We had several conversations 4 about this as it pertained to Ashlee, 5 as it pertained to Jessica, as well as 6 about Dr. Jibril, and then myself, when 7 I came back from Boston. 8 Q. And you considered Mr. Sebag's 9 conduct towards you during the Boston 10 trip and thereafter discriminatory or 11 harassing? 12 A. Yes. 13 Q. In what respects? 14 A. I felt that his behavior would 15 not have been the same had I been a 16 man. 17 Q. And what behavior was he 18 engaging in with you that made you come 19 to that conclusion? 20 A. He called me on my cell and was 21 very demeaning. 22 Q. And was this the call when you 23 were in Boston when he called you on 24 your cell? 25 A. Yes.</p>

<p style="text-align: right;">Page 18</p> <p>1 V. VILLETTI 2 Q. Okay. And in what ways was his 3 conversation demeaning to you? 4 A. He was loud and had a very 5 condescending tone and did not give me 6 any opportunity to explain the context, 7 just talked down at me. 8 Q. And it's your belief that he 9 would not have had such conversations 10 were you a man? 11 A. Yes. 12 Q. Had you ever had the occasion to 13 listen to Mr. Sebag talk to a male 14 employee under similar circumstances? 15 A. No. 16 Q. And why, again, was Mr. Sebag 17 concerned about your presence in 18 Boston? 19 A. You would have to ask him. 20 Q. What did he express to you was 21 his concern about why you were in 22 Boston? 23 A. That I was -- I had not 24 consulted him prior to the trip. 25 Q. And you recall your testimony</p>	<p style="text-align: right;">Page 20</p> <p>1 V. VILLETTI 2 Q. In this conversation that Bouker 3 had with you relating this exchange 4 with Albert, did Bouker express to you 5 he felt demeaned during this 6 conversation? 7 A. No. 8 Q. Or that Mr. Sebag was 9 condescending to him? 10 A. No. 11 Q. Did Bouker tell you that Albert 12 raised his voice to him on the slopes? 13 A. I don't recall. 14 Q. If we could look back at Exhibit 15 I, the second paragraph in procedures 16 for reporting harassment and 17 discrimination. It's on page 11. 18 The paragraph reads whether or 19 not an individual chooses to confront 20 the offender directly, the individual 21 should promptly notify his or her 22 supervisor or human resources and 23 submit an employee complaint form, 24 which can be found on Guidepoint's 25 internet and in human resources at any</p>
<p style="text-align: right;">Page 19</p> <p>1 V. VILLETTI 2 last time of concerns you believe 3 Mr. Sebag had about Mr. Pool's 4 vacationing and absences? 5 A. Yes. 6 Q. Were you ever witness to 7 Mr. Sebag counseling Mr. Pool about his 8 vacations and absences? 9 A. No. 10 Q. Did Mr. Pool share any of that 11 with you; that Albert had said certain 12 things to him about absences or 13 vacations? 14 A. Yes. 15 Q. And what did Bouker say? 16 A. Bouker said that while he was on 17 the ski slope, he encountered 18 Mr. Sebag. And Mr. Sebag expressed a 19 great deal of frustration with him 20 being on the slope and asked him what 21 he was doing there. To which he 22 responded he was on vacation. And 23 Mr. Sebag expressed that he had not 24 authorized it. And Bouker said that he 25 had. And they went back and forth.</p>	<p style="text-align: right;">Page 21</p> <p>1 V. VILLETTI 2 time. 3 Do you see that, Ms. Villett? 4 A. Yes. 5 Q. Were you aware of the existence 6 of such an employee complaint form when 7 you were with Guidepoint? 8 A. No. 9 Q. Did you ever submit an employee 10 complaint form to your supervisor? 11 A. No. 12 Q. And your supervisor would have 13 been Bouker? 14 A. Yes. 15 Q. Did you ever submit an employee 16 complaint form to HR? 17 A. No. 18 Q. You did make a complaint to HR, 19 though, right? 20 A. Yes. 21 Q. And if you see the next section, 22 it's an investigation of complaints 23 section. 24 You see that section? 25 A. Yes.</p>

<p style="text-align: right;">Page 22</p> <p>1 V. VILLETTI 2 Q. And what is your knowledge of 3 the investigation of your complaint to 4 HR? 5 A. I don't know. 6 Q. You don't know what your 7 knowledge is of the complaint? 8 A. I don't know what the extent of 9 the investigation was, if any. 10 Q. Was your complaint investigated? 11 A. I don't know. 12 Q. Who did you make the complaint 13 to? 14 A. Priscilla. 15 Q. Separate and apart from your 16 complaint, when you were at Guidepoint, 17 were you ever asked to participate in 18 an investigation? 19 A. I can't recall. 20 MR. GRECH: Could we mark 21 this as K? 22 - - - 23 (Whereupon, Defendant's 24 Exhibit K, an e-mail exchange, 25 was marked for identification.)</p>	<p style="text-align: right;">Page 24</p> <p>1 V. VILLETTI 2 9:23 a.m.; is that correct? 3 A. Yes. 4 Q. And this is what you are deeming 5 your complaint, correct? 6 A. Yes. 7 Q. And thereafter, there is an 8 exchange between you and Priscilla, 9 correct? 10 A. Yes. 11 Q. All right. So if we could look 12 first at your first e-mail on 13 March 12th. In the second paragraph, 14 you make reference to over the past 15 several months that you had brought 16 management issues and toxic work 17 environment in our team to the 18 attention of both you, meaning 19 Priscilla and John. 20 Who is John? 21 A. John Campanella who is the CFO. 22 Q. So over the past several months, 23 when was the first time you brought 24 management issues and toxic work 25 environment to Priscilla's attention?</p>
<p style="text-align: right;">Page 23</p> <p>1 V. VILLETTI 2 - - - 3 Q. Ms. Villetti, we are showing you 4 what's been marked as Defendant's 5 Exhibit K. If you could take a moment 6 to look at that, please (handing). 7 A. (Witness complied). 8 Q. Ms. Villetti, you have had a 9 chance to review Exhibit K? 10 A. Yes. 11 Q. Do you recognize it? 12 A. Yes. 13 Q. And what is it? 14 A. It's an e-mail complaint that I 15 sent to Priscilla requesting a meeting 16 to discuss what I perceived to be 17 continuous mistreatment of women at 18 Guidepoint. 19 Q. And Exhibit K is an e-mail 20 exchange or e-mail chain between you 21 and Priscilla? 22 A. Yes. 23 Q. And it -- the first e-mail in 24 time in Exhibit K is your e-mail to 25 Priscilla dated March 12, 2018 at</p>	<p style="text-align: right;">Page 25</p> <p>1 V. VILLETTI 2 A. I don't recall the specifics. 3 But I had several conversations with 4 her about this. 5 Q. Had you documented your concerns 6 prior to this e-mail? 7 A. In writing, no. 8 Q. And when did you first speak 9 with John about management issues and 10 toxic work environment? 11 A. I don't recall the exact dates. 12 Q. Did you document any of those 13 complaints to John? 14 A. In writing, no. 15 Q. Did you document it in any other 16 way? 17 A. No. I had spoken conversations 18 with him. 19 Q. With John and Priscilla? 20 A. Yes. 21 Q. Predating this e-mail complaint? 22 A. Yes. 23 Q. And at the time you were writing 24 this e-mail, what management issues did 25 you have in mind?</p>

<p style="text-align: right;">Page 26</p> <p>1 V. VILLETTI</p> <p>2 A. I think one of the main concerns 3 I had at the time was that Rutwik, who 4 was not even an employee of Guidepoint, 5 was appearing to take a management role 6 at my team. And we had not had any 7 communication from HR otherwise about 8 him being an employee or us reporting 9 to him otherwise.</p> <p>10 Q. And how did you know that Rutwik 11 was or was not a Guidepoint employee?</p> <p>12 A. He was a consultant in the 13 system.</p> <p>14 Q. Were there other consultants in 15 the system at the time?</p> <p>16 A. I don't know. I wasn't 17 interacting with them.</p> <p>18 Q. And a consultant is not an 19 employee?</p> <p>20 A. I don't know.</p> <p>21 Q. In what ways was Rutwik 22 attempting to take management of your 23 team?</p> <p>24 A. He felt he could dictate what 25 each member of the team was to do, when</p>	<p style="text-align: right;">Page 28</p> <p>1 V. VILLETTI</p> <p>2 Q. Any other management issues? We 3 will discuss them in detail. But were 4 there any more on the list?</p> <p>5 A. Our inability to hire the staff 6 needed to perform our job.</p> <p>7 Q. And you had communicated your 8 concern about Bouker's absences with 9 Priscilla before?</p> <p>10 A. Yes.</p> <p>11 Q. And you had communicated them -- 12 your concern about Bouker's absences 13 with John before?</p> <p>14 A. I don't know.</p> <p>15 Q. And what was your concern about 16 Bouker's absences?</p> <p>17 A. I felt that his frequent 18 absences created a leadership vacuum 19 and led to chaos.</p> <p>20 Q. All right. We talked about the 21 management issue, focused on Rutwik.</p> <p>22 In what way, if any, did that 23 demonstrate to you discrimination based 24 on your gender?</p> <p>25 A. I don't understand the question.</p>
<p style="text-align: right;">Page 27</p> <p>1 V. VILLETTI</p> <p>2 they were do it. And he felt he could 3 call us, e-mail us at all hours 4 demanding things, pull us into 5 meetings.</p> <p>6 Q. Was Rutwik behaving the same way 7 toward Bouker?</p> <p>8 A. No.</p> <p>9 Q. Was Rutwik behaving that way 10 toward anyone other than yourself?</p> <p>11 A. To my knowledge, he was also 12 doing that to Jessica.</p> <p>13 Q. Anyone else?</p> <p>14 A. I don't know.</p> <p>15 Q. What about Justin?</p> <p>16 A. Not to my knowledge.</p> <p>17 Q. Any other management issues that 18 were of concern to you on March 12, 19 2018?</p> <p>20 A. There were issues with Bouker 21 being absent frequently. And, you 22 know, the lack of clarification 23 surrounding my performance metrics, 24 which I had sought clarification on. I 25 saw that as a management failing.</p>	<p style="text-align: right;">Page 29</p> <p>1 V. VILLETTI</p> <p>2 Q. We talked about Rutwik dictating 3 what team members were going to do and 4 calling them and e-mailing them and 5 calling meetings, right?</p> <p>6 A. Yes.</p> <p>7 Q. What, if any, part of that made 8 you feel he was doing that to you 9 because you were a woman?</p> <p>10 A. He was doing that to me and to 11 Jessica.</p> <p>12 Q. Okay.</p> <p>13 A. And not to anyone else.</p> <p>14 Q. Who else was on the team to do 15 that to?</p> <p>16 A. There was Justin. There was 17 Bouker.</p> <p>18 Q. And what did you mean by toxic 19 work environment in your complaint?</p> <p>20 A. Rutwik's presence, for one.</p> <p>21 Q. How long had Rutwik been there 22 at this time?</p> <p>23 A. For several months, as I recall.</p> <p>24 Q. Any other components of the 25 toxic work environment other than</p>

<p>1 V. VILLETTI 2 Rutwik's presence? 3 A. I can't recall. 4 Q. And you talked briefly earlier 5 about performance metrics. And you 6 specifically mentioned that next or you 7 said you sought clarification on your 8 performance metrics and bonus structure 9 repeatedly since last December with no 10 resolve. 11 And what was your specific 12 concern there? 13 A. I was not given any guidelines 14 or structure about how my performance 15 was being measured or my bonus was 16 being decided. 17 Q. And last December would have 18 been 2017, correct? 19 A. Correct. 20 Q. And when did you start with 21 Guidepoint? 22 A. In September. 23 Q. So had you ever received a bonus 24 from Guidepoint? 25 A. I believe so. There was one</p>	<p>Page 30</p> <p>1 V. VILLETTI 2 Q. Okay. And what did you and John 3 talk about concerning your performance 4 metrics? 5 A. I sought clarification. 6 Q. And John's response was? 7 A. He didn't provide any 8 clarification. 9 Q. What was John's role with the 10 company again? 11 A. CFO. 12 Q. Did you speak to Albert about 13 your performance metrics? 14 A. No. 15 Q. Other than Bouker and John, did 16 you speak with anyone else about your 17 performance metrics? 18 A. Priscilla. 19 Q. Okay. And when did you and 20 Priscilla talk about your performance 21 metrics? 22 A. I don't recall the specifics. 23 Q. Was it an in-person 24 conversation? 25 A. Yes.</p>
<p>1 V. VILLETTI 2 bonus which came for 2017, for the end. 3 Q. And what was your understanding 4 of what your performance metrics were? 5 A. I don't have an understanding of 6 it. 7 Q. Who did you expect to give you 8 that understanding? 9 A. I sought it from multiple 10 sources. No one gave me a clear 11 understanding. 12 Q. Did you seek it from Bouker? 13 A. Yes. 14 Q. And the result was? 15 A. I don't think he knew. 16 Q. But he was your supervisor? 17 A. Yes. 18 Q. Did you seek it from Rutwik? 19 A. I don't recall. 20 Q. Did you seek it from John? 21 A. Yes. 22 Q. And in what way? Did you talk 23 to him, call him, e-mail about your 24 performance metrics? 25 A. In-person meeting.</p>	<p>Page 31</p> <p>1 V. VILLETTI 2 Q. And you asked her for 3 clarification on your performance 4 metrics? 5 A. Yes. 6 Q. And what was her response? 7 A. She didn't provide any 8 clarification. 9 Q. Okay. Do you feel that the lack 10 of clarification on your performance 11 metrics was based in any way on your 12 gender? 13 A. I don't know. 14 Q. What was your bonus structure 15 when you were at Guidepoint? 16 A. There was no structure. 17 Q. You received a bonus based upon 18 2017? 19 A. Yes. 20 Q. How much was the bonus? 21 A. I don't remember. You can find 22 it in the numbers. 23 Q. What was it based upon? 24 A. It was an agreed-upon amount 25 prior to my joining the firm.</p>

<p style="text-align: right;">Page 34</p> <p>1 V. VILLETTI 2 Q. And who made the agreement? 3 A. Bouker and Priscilla. 4 Q. We also talked about an 5 inability to hire staff. 6 And your complaint continues 7 furthermore, I have performed under a 8 staff shortage and the routine absence 9 by my manager. 10 I assume we are talking about 11 Bouker here? 12 A. Yes. 13 Q. Including his most three-week 14 break. 15 And what staff shortage were you 16 experiencing as reflected in your March 17 complaint? 18 A. My associate Liana Yamin had 19 left at that point. And I was also 20 instructed to increase the output of 21 the healthcare content and 22 simultaneously unable to hire people to 23 do so. 24 Q. And in what way did this staff 25 shortage reflect, in your opinion,</p>	<p style="text-align: right;">Page 36</p> <p>1 V. VILLETTI 2 discussed before? 3 A. Yes. 4 Q. And Albert on the call when you 5 were at Boston? 6 A. Yes. 7 Q. Was Albert dismissive or 8 belittling of you at any other time 9 other than his call to you when you 10 were at Boston? 11 A. No. I don't recall. 12 Q. The same paragraph, we are 13 continuing on, your complaint reads the 14 increasing aggression, abusive 15 language, and unjustified deterioration 16 of my role has led to serious anxiety, 17 stress-induced physical pain, and 18 difficulty sleeping for me. 19 Do you see that? 20 A. Yes. 21 Q. And who was being increasingly 22 aggressive toward you? 23 A. Rutwik. 24 Q. And Rutwik would use abusive 25 language with you?</p>
<p style="text-align: right;">Page 35</p> <p>1 V. VILLETTI 2 gender discrimination by Guidepoint? 3 A. Well, I was taught that I had a 4 mandate and I was able to hire. But 5 when I wanted to hire Dr. Jibril, I was 6 prevented from doing so. 7 Q. And was there anything about 8 Ms. Yamin's departure that would lead 9 you to the conclusion that it was based 10 on gender discrimination? 11 A. No. She left for another role. 12 Because she wouldn't get a pay increase 13 that was -- that would have been 14 required for her to stay. 15 Q. Okay. In the next paragraph, 16 you say that instead, after talking 17 about some acknowledgements, that you 18 have endured being continuously 19 dismissed and belittled. 20 Do you see that? 21 A. Yes. 22 Q. And who dismissed and belittled 23 you? 24 A. Rutwik and Albert. 25 Q. Rutwik in the same ways we have</p>	<p style="text-align: right;">Page 37</p> <p>1 V. VILLETTI 2 A. Yes. 3 Q. How so? I mean, do you have an 4 example? 5 A. Yes. When he shouted at me I am 6 the boss of you and boss of everybody 7 else here, there were several F bombs. 8 Q. Gotcha. 9 Is that the way Rutwik speaks 10 normally? 11 A. No. 12 Q. Had you ever heard Rutwik drop F 13 bombs when speaking with someone else? 14 A. No. 15 Q. Did Albert ever use abusive 16 language? 17 A. Arguably, on the call that he 18 made to me. 19 Q. There is a, sort of, broad 20 interpretation of abusive language. 21 Did Albert utter any profanities 22 to you on the call? 23 A. No. But his tone was hostile 24 and demeaning. 25 Q. Okay. In what way was Albert's</p>

<p style="text-align: right;">Page 38</p> <p>1 V. VILLETTI 2 tone on the call then abusive? 3 A. He shouted at me that I was not 4 to speak and he was to talk at me 5 essentially. 6 Q. And this was during the 7 telephone call while you were in 8 Boston? 9 A. Yes. 10 Q. Okay. And had Albert ever 11 displayed aggression toward you? 12 A. No. I didn't interact with 13 Albert. 14 Q. Other than the call in Boston? 15 A. Yes. And another interaction I 16 had with him in a kitchen. 17 Q. Okay. Was he aggressive or 18 abusive in that interaction? 19 A. No. 20 Q. In what ways was Rutwik 21 aggressive with you? 22 A. As I mentioned before, he felt 23 he could call us, e-mail, pull us into 24 meetings, yell at us of what we should 25 do or shouldn't do.</p>	<p style="text-align: right;">Page 40</p> <p>1 V. VILLETTI 2 Q. How many trips had you taken for 3 Guidepoint during your tenure there? 4 A. I don't recall the specifics. 5 Q. Do you have an estimate? 6 A. Three, I believe. 7 Q. Including Boston? 8 A. Yes. 9 Q. Did you take any trips to -- for 10 Guidepoint work after Boston? 11 A. No. 12 - - - 13 (Whereupon, a discussion was 14 held off the record.) 15 - - - 16 Q. And here your complaint was that 17 Albert had abruptly taken away your 18 leadership of the conferences, correct? 19 A. Yes. 20 Q. And in what ways were you 21 established as a leader of conferences? 22 A. That was a part of my role. 23 Q. What role did Bouker have with 24 the conferences? 25 A. Bouker just approved things at</p>
<p style="text-align: right;">Page 39</p> <p>1 V. VILLETTI 2 Q. And you also experienced a 3 deterioration of your role? 4 A. Yes. 5 Q. In what way? 6 A. When Albert called me, he said 7 that I was not allowed to travel 8 anymore for my role and I was 9 essentially not allowed to do anything 10 without his explicit permission. And 11 being the head of healthcare content, 12 that had not been a part of the 13 arrangement when I took the job. 14 Q. And do you go into that in more 15 detail in this next paragraph here 16 where you say Albert effectively 17 changed my role abruptly and taken over 18 my leadership over the conferences? 19 A. Yes. 20 Q. And now seemingly any agency 21 over teleconferences, barred me from 22 traveling, which is essential for me to 23 perform my job. 24 Do you see that? 25 A. Yes.</p>	<p style="text-align: right;">Page 41</p> <p>1 V. VILLETTI 2 the late stage of a decision. 3 Q. Did Rutwik have any role at the 4 conferences? 5 A. No. 6 Q. And when we -- and we talked 7 about this last time; conferences 8 versus teleconferences. 9 When we say conferences here, 10 these are events that you would travel 11 to? 12 A. Not just travel to. Some were 13 in New York. It was in-person 14 meetings. 15 Q. In-person meetings, thank you. 16 Separate and apart from a 17 teleconference, correct? 18 A. Yes. 19 Q. Okay. And so you would also 20 have leadership over healthcare content 21 teleconferences? 22 A. Yes. 23 Q. How many teleconferences would 24 you have conducted while you were at 25 Guidepoint?</p>

<p style="text-align: right;">Page 42</p> <p>1 V. VILLETTI 2 A. Many. 3 Q. Was there a frequency in which 4 they occurred? Was it once a week? A 5 couple times a -- how many -- how would 6 you say in terms of frequency? 7 A. It varied from once a week to 8 three times a week. 9 Q. And Boston was an in-person 10 conference, correct, it wasn't a 11 teleconference? 12 A. Yes. 13 Q. Did you have any teleconferences 14 for Guidepoint after your Boston trip? 15 A. Yes. 16 Q. How many? 17 A. I don't recall exactly. 18 Probably two or three. 19 Q. Did you have to seek Albert's 20 approval for those two to three 21 teleconferences? 22 A. I had to seek Rutwik's. 23 Q. Had you had to seek Rutwik's 24 approval prior to these two to three 25 conferences?</p>	<p style="text-align: right;">Page 44</p> <p>1 V. VILLETTI 2 recruited in 2017 to serve as a subject 3 matter expert who would lead the HLC -- 4 What does HLC stand for? 5 A. Healthcare. 6 Q. -- portion of the business in my 7 group. And I accepted this position in 8 good faith. I was also told I was 9 joining a start-up where I would help 10 build the team. 11 This has all proved to be highly 12 misleading. And I have since observed 13 my own employment trajectory following 14 a familiar pattern at Guidepoint. 15 Do you see that portion of your 16 complaint? 17 A. Yes. 18 Q. And who communicated to you that 19 you were, by joining Guidepoint, 20 joining a start-up? 21 A. Bouker. 22 Q. And when did he do that? 23 A. When I was being interviewed. 24 Q. In what respects did Bouker tell 25 you Guidepoint was a start-up?</p>
<p style="text-align: right;">Page 43</p> <p>1 V. VILLETTI 2 A. Approval, no. 3 Q. What did you have to seek from 4 Rutwik? 5 A. I didn't have to seek anything. 6 I was told that I should consult him. 7 Q. And who told you you should 8 consult with Rutwik about 9 teleconferences? 10 A. Bouker. 11 Q. And when did Bouker tell you 12 that? 13 A. Around the time he showed up. 14 Q. Pre Boston or post Boston? 15 A. Pre Boston. 16 Q. After your telephone call with 17 Albert when you were in Boston, did you 18 have any other communications with 19 Albert? 20 A. No. 21 Q. Going on in your complaint, you 22 see the paragraph that starts I was 23 sought out and recruited? 24 A. Yes. 25 Q. You were sought out and</p>	<p style="text-align: right;">Page 45</p> <p>1 V. VILLETTI 2 A. He never said Guidepoint was a 3 start-up. He said the content team was 4 like a start-up, hence the quotation 5 marks. 6 Q. Okay. How many other content 7 teams were at Guidepoint when you were 8 interviewing? 9 A. We were the content team. 10 Q. If that team was a start-up, 11 what other teams were there? 12 A. At Guidepoint as a whole? 13 Q. Correct. 14 A. As I recall, there was the main 15 business line, which was one-on-one 16 client calls. There was a data team. 17 There was a surveys team. 18 Q. And was it your impression that 19 those other teams were established and 20 not, quote, start-ups? 21 A. Yes. 22 Q. And here you say that your 23 employment trajectory is following a 24 familiar pattern at Guidepoint. 25 What was -- first, what was the</p>

<p style="text-align: right;">Page 46</p> <p>1 V. VILLETTI 2 trajectory? 3 A. That I was brought on under the 4 premise that I was going to be 5 effectively a leader in that particular 6 segment of the business. And then over 7 a period of time, my role gradually 8 deteriorated. 9 Q. Deteriorated in the way that we 10 have talked about before? 11 A. Yes. 12 Q. And what was the familiar 13 pattern at Guidepoint that you were 14 referencing here? 15 A. The familiar pattern is how they 16 treated women. 17 Q. And which women did you have in 18 mind when you wrote familiar pattern? 19 A. Ashlee and Jessica. 20 Q. Which makes sense. Because then 21 you start talking about Ashlee in your 22 complaint, right? 23 A. Yes. 24 Q. And here you say you spoke with 25 Ashlee's team following her departure,</p>	<p style="text-align: right;">Page 48</p> <p>1 V. VILLETTI 2 A. Yes. 3 Q. And your complaint also talks 4 about Faiza. And that's Dr. Jibril, 5 correct? 6 A. Yes. 7 Q. You said you were not permitted 8 to discuss or defend the choice, the 9 choice being to hire Dr. Jibril, and 10 that you don't believe Albert even met 11 her. 12 As you sit here today, do you 13 know whether Dr. Jibril ever met with 14 Albert? 15 A. Not to my knowledge. 16 Q. You interviewed Dr. Jibril, 17 correct? 18 A. Yes. 19 Q. Did anyone else interview 20 Dr. Jibril? 21 A. Yes. 22 Q. Who? 23 A. Bouker Pool, Justin Ruiz, 24 Priscilla, and there was another guy in 25 HR that I don't remember the name of.</p>
<p style="text-align: right;">Page 47</p> <p>1 V. VILLETTI 2 correct? 3 A. Yes. 4 Q. And that no one had -- that the 5 team had informed you that no one had 6 sought their opinion and notified them 7 and Ashlee was, in fact, a great 8 leader. 9 Do you see that? 10 A. Yes. 11 Q. And who was -- who were the 12 members of Ashlee's team that you spoke 13 with? 14 A. I don't recall their names. 15 Q. How many people? 16 A. I talked to three or four of 17 them. 18 Q. Men? Women? 19 A. Women. 20 Q. All women? 21 A. Yes. 22 Q. And then your complaint 23 continues and you talk about Jessica. 24 We have talked about Jessica before, 25 correct?</p>	<p style="text-align: right;">Page 49</p> <p>1 V. VILLETTI 2 James, James something. 3 Q. That you know, is Priscilla 4 still an employee of Guidepoint? 5 A. Currently? 6 Q. Yes. 7 A. I believe so. 8 Q. Other than Dr. Jibril, had you 9 made any other recommendations for hire 10 at Guidepoint? 11 A. No. 12 Q. You talked about your associate 13 leaving, right? 14 A. Yes. 15 Q. Were there efforts to replace 16 her? 17 A. Yes. 18 Q. And what were those efforts? 19 A. We -- I created a listing for 20 the job. It was to be posted 21 internally and externally. 22 Q. Did that lead to any interviews? 23 A. I was supposed to interview 24 people. But it never happened. 25 Q. Did anyone else interview anyone</p>

<p style="text-align: right;">Page 50</p> <p>1 V. VILLETTI 2 to fill the position of your associate? 3 A. My associate specifically, no. 4 Q. So was there ever an occasion 5 where you would have recommended 6 someone to replace your departing 7 associate? 8 A. No. 9 Q. The last paragraph in your 10 complaint, you said that you appreciate 11 the rapport between yourself and 12 Priscilla and genuinely hope that we 13 can find an amicable resolution here. 14 Do you see that? 15 A. Yes. 16 Q. You have a good relationship 17 with Priscilla? 18 A. Very good relationship. 19 Q. And you felt comfortable 20 bringing this complaint to her 21 attention? 22 A. Yes. 23 Q. And she was head of HR at that 24 point, so the proper person to bring 25 the complaint to?</p>	<p style="text-align: right;">Page 52</p> <p>1 V. VILLETTI 2 with Priscilla? 3 A. I don't know. 4 Q. Did anyone else speak to you 5 concerning your complaint after your 6 March 12th meeting with Priscilla? 7 A. I may have spoken to Priscilla 8 again about it. 9 Q. You had another meeting with 10 Priscilla? 11 A. I believe so. 12 Q. And when did that occur? 13 A. I don't know exactly. 14 Q. After March 12th, though? 15 A. Yes. 16 Q. Okay. Was it just that one more 17 meeting? 18 A. I believe so. 19 Q. And do you recall what you 20 talked about with Priscilla at that 21 second meeting? 22 A. I don't recall. 23 Q. Other than Priscilla, did you 24 speak about your complaint with anyone 25 else?</p>
<p style="text-align: right;">Page 51</p> <p>1 V. VILLETTI 2 A. Yes. 3 Q. If you could just turn back to 4 the first page -- 5 - - - 6 (Whereupon, a discussion was 7 held off the record.) 8 - - - 9 Q. -- Exhibit K. And here there's 10 Priscilla's reply, where she asks does 11 3 o'clock work for you today -- to 12 discuss today. And then your response: 13 Yes, I will come by your office at that 14 time. Thank you. 15 Do you see that? 16 A. Yes. 17 Q. And you ultimately had a meeting 18 with Priscilla about your complaint? 19 A. Yes. 20 Q. During that meeting, did 21 Priscilla tell you what the next steps 22 would be concerning your complaint? 23 A. I don't recall. 24 Q. Were any steps taken regarding 25 your complaint following your meeting</p>	<p style="text-align: right;">Page 53</p> <p>1 V. VILLETTI 2 A. No. 3 MR. GRECH: Can you mark 4 this as L, please? 5 - - - 6 (Whereupon, Defendant's 7 Exhibit L, an e-mail exchange, 8 was marked for identification.) 9 - - - 10 Q. Ms. Villette, we are showing you 11 what's been marked as Defendant's 12 Exhibit L. If you could take a moment 13 to look that over, please (handing). 14 A. Okay. 15 Q. Have you had a chance to look at 16 Exhibit L? 17 A. Yes. 18 Q. Do you recognize it? 19 A. Yes. 20 Q. What is it? 21 A. It is an e-mail from my boss, 22 Bouker Pool, to Priscilla regarding 23 Rutwik's inappropriate behavior and him 24 leading to a threatening and hostile 25 work environment.</p>

<p style="text-align: right;">Page 54</p> <p>1 V. VILLETTI 2 Q. Had you seen this e-mail before 3 today? 4 A. Yes. 5 Q. And what were the circumstances 6 of you seeing this e-mail before today? 7 A. The day my boss was filing this, 8 he called me and he read the e-mail to 9 me. And just said I want you to be 10 aware I'm filing this complaint. 11 Q. It was your understanding that 12 Bouker called you and read the contents 13 of this e-mail before he clicked send 14 to Priscilla? 15 A. I don't know the timing. 16 Q. Did Bouker communicate to you 17 that this is an e-mail I'm about to 18 send or that I have sent to Priscilla? 19 A. I don't recall. 20 Q. But he read you the contents of 21 what he explained was an e-mail 22 complaint? 23 A. Yes. 24 Q. And it appears to be that 25 complaint here?</p>	<p style="text-align: right;">Page 56</p> <p>1 V. VILLETTI 2 But you can answer. 3 A. I don't know. 4 Q. When Bouker called you to say 5 this is the content of my e-mail 6 complaint, did he tell you who he was 7 complaining about? 8 A. I don't recall. 9 Q. In the first paragraph, it 10 mentions Rutwik by name? 11 A. Yes. 12 Q. Is Albert mentioned anywhere in 13 this e-mail? 14 A. Doesn't appear to be. 15 Q. When you spoke to Bouker about 16 the e-mail, did he say I'm filing the 17 complaint about Albert? 18 A. I don't recall him mentioning 19 that. 20 Q. Who were the members of Bouker's 21 team on March 16, 2018? 22 A. Would have been me, Justin, 23 Jessica, and the four girls that 24 reported to Jessica prior to being 25 transferred to reporting to Bouker.</p>
<p style="text-align: right;">Page 55</p> <p>1 V. VILLETTI 2 A. Yes. 3 Q. And why did Bouker tell you he 4 wanted you to know? 5 A. As a member of his team, he 6 would communicate something like that. 7 Q. And Bouker read to you. And you 8 see now that he reported to Priscilla 9 that he was compelled to elevate the 10 matter to a formal notification to HR, 11 because members of his team, both 12 verbally and via written communiqué, 13 are complaining of threatening language 14 and actions creating a hostile work 15 environment. 16 Do you see that? 17 A. Yes. 18 Q. This is all in reference to 19 Rutwik? 20 A. Yes. 21 Q. Is any of Bouker's complaint 22 here based upon Albert's actions or is 23 it all Rutwik? 24 MR. LICHTEN: I'm going to 25 object, because it's speculating.</p>	<p style="text-align: right;">Page 57</p> <p>1 V. VILLETTI 2 Q. And we talked about that on your 3 first day, right? 4 A. Yes. 5 Q. Had you sent any written 6 communications to Bouker about your 7 hostile work environment complaints 8 concerning Rutwik? 9 A. I'm sorry? 10 Q. Sure. 11 Did you send Bouker anything in 12 writing complaining that Rutwik was 13 creating a hostile work environment? 14 A. I believe I had complained about 15 Rutwik's behavior several times to 16 Bouker. 17 Q. In writing? 18 A. I don't recall the specifics, 19 but likely so. 20 MR. GRECH: We will review 21 the production from plaintiffs. 22 But to the extent that it's not 23 in there, we are calling for the 24 production of any written 25 communiqué from Ms. Villetti to</p>

<p style="text-align: right;">Page 58</p> <p>1 V. VILLETTI 2 Bouker complaining about the 3 hostile work environment created 4 by Rutwik. I'll follow up in 5 writing. 6 Q. Ms. Villette, were you aware of 7 any other written communications by any 8 other members of your team to Bouker 9 about a hostile work environment? 10 A. I wasn't aware. And also I 11 don't have access to my Guidepoint 12 e-mail -- 13 Q. Sure. 14 A. -- inbox. 15 Q. Sure, understood. 16 At the time you were employed by 17 Guidepoint, do you recall receiving a 18 written communication from any of these 19 team members about Rutwik creating a 20 hostile work environment? 21 A. I can't recall. 22 Q. Did you have communications with 23 Justin -- strike that. 24 Did you have conversations with 25 Justin about Rutwik creating a hostile</p>	<p style="text-align: right;">Page 60</p> <p>1 V. VILLETTI 2 A. It would have been the team. 3 Q. You, Bouker, Justin, and 4 Jessica? 5 A. And the -- 6 Q. Four girls -- 7 A. -- four girls. 8 Q. -- that had reported to Jessica 9 but then reported to Bouker? 10 A. Yes. 11 Q. All right. And what was 12 discussed during that -- well, was 13 Rutwik at the meeting? 14 A. I don't believe so, no. 15 Q. And what about hostile work 16 environment was discussed at this team 17 meeting? 18 A. I don't recall the specifics. 19 But I remember a conversation 20 surrounding his behavior towards the 21 various team members. 22 Q. And in that meeting, Bouker 23 shared with the team that he felt 24 Rutwik was creating a hostile work 25 environment?</p>
<p style="text-align: right;">Page 59</p> <p>1 V. VILLETTI 2 work environment? 3 A. As my teammate, I would imagine 4 so. 5 Q. Do you recall specifically 6 whether you did? 7 A. I don't recall the specifics, 8 but I likely did. 9 Q. And did you have conversations 10 with Jessica about Rutwik creating a 11 hostile work environment? 12 A. I believe it was discussed in a 13 team meeting. 14 Q. And when was this team meeting? 15 A. Sometime after the Boston trip. 16 Q. And who was at the meeting? 17 A. Actually, strike that. 18 Sometime before or after the 19 Boston meeting, but in that period. 20 Q. Sometime early March of 2018? 21 A. I would say around then. It was 22 one of the last team meetings we had 23 prior to me being let go. 24 Q. Okay. And who was at the 25 meeting?</p>	<p style="text-align: right;">Page 61</p> <p>1 V. VILLETTI 2 A. I don't recall. 3 Q. Who on the team mentioned their 4 concern about Rutwik's behavior during 5 this team meeting? 6 A. Jessica, as well as the other 7 girls, the four girls. 8 Q. Did Bouker? 9 A. No. 10 Q. Did Justin? 11 A. No, not to my knowledge. 12 Q. When Bouker called you to tell 13 you about this e-mail, did you tell him 14 that you had, a few days prior, done 15 the same thing? 16 A. I may have. I don't remember. 17 Q. Before you sent your e-mail to 18 Priscilla, did you speak with Bouker -- 19 A. No. 20 Q. -- about your e-mail? 21 A. No. 22 Q. In the last paragraph in 23 Bouker's e-mail, it says he's informed 24 to his direct reports that he has filed 25 a formal complaint, so they are aware</p>

<p style="text-align: right;">Page 62</p> <p>1 V. VILLETTI 2 he's advocating on their behalf for a 3 positive work environment. 4 Do you see that? 5 A. Yes. 6 Q. Did Bouker have any direct 7 reports other than the team members 8 that we talked about? 9 A. I don't -- not to my knowledge. 10 I don't know. 11 Q. During the team meeting, did 12 Bouker say to the team all right, I'm 13 going to report this to Priscilla? 14 A. I don't remember. 15 Q. Did you tell the team that you 16 were going to report to Priscilla? 17 A. No. 18 Q. Before sending the e-mail to 19 Priscilla, did you tell anyone that you 20 were going to file a complaint? 21 A. No. 22 Q. Did anyone in human resources 23 approach you about Bouker's complaint? 24 A. I don't remember. But it's 25 possible that the follow-up meeting I</p>	<p style="text-align: right;">Page 64</p> <p>1 V. VILLETTI 2 to look at that, please (handing). 3 A. (Witness complied). 4 Q. Ms. Villett, have you had a 5 chance to look at Exhibit M? 6 A. Yes. 7 Q. Do you recognize it? 8 A. Yes. 9 Q. And what is it? 10 A. It is an e-mail communication 11 regarding the Boston trip between 12 myself and Albert. 13 Q. And this would have been around 14 the time you had a telephone 15 conversation with Albert about Boston? 16 A. Yes. It appears it was right 17 before and then right after. 18 Q. Okay. If you could look at page 19 1 of Exhibit M, Albert's March 1st 20 e-mail at 12:04 p.m. 21 Can you see that? 22 A. Yes. 23 Q. From now on, your focus is one 24 hundred percent on teleconferences. 25 Someone else will take over in-person</p>
<p style="text-align: right;">Page 63</p> <p>1 V. VILLETTI 2 had with Priscilla discussed that. 3 Q. The second meeting we talked 4 about after your complaint? 5 A. Yes. 6 Q. Do you know if anyone 7 communicated with Rutwik concerning 8 Bouker's complaint? 9 A. I don't know. 10 Q. Do you know if anyone 11 communicated with Justin about Bouker's 12 complaint? 13 A. I don't know. 14 Q. What about Jessica? 15 A. I don't know. 16 MR. GRECH: Can we mark this 17 as M, please? 18 - - - 19 (Whereupon, Defendant's 20 Exhibit M, an e-mail exchange, 21 was marked for identification.) 22 - - - 23 Q. Ms. Villett, we are showing you 24 what's been marked as Defendant's 25 Exhibit M. If you could take a moment</p>	<p style="text-align: right;">Page 65</p> <p>1 V. VILLETTI 2 events. Clear? 3 Do you see that? 4 A. Yes. 5 Q. Who took over the in-person 6 events after this e-mail communication? 7 A. I don't know. 8 Q. Was there any in-person events 9 held after March 1st but before your 10 separation from Guidepoint? 11 A. I don't recall. 12 Q. And Albert told you that your 13 focus would be 100 percent on 14 teleconferences, correct? 15 A. Yes. 16 Q. And in what way did that make 17 you feel he was taking over your agency 18 over telephone conferences? 19 A. I don't believe he was taking 20 over my agency over teleconferences. 21 Q. Can you look back at your e-mail 22 to Priscilla, second page of that 23 exhibit, first full paragraph, there is 24 a parenthetical on the third line. Now 25 seemingly any agency overtake</p>

<p>1 V. VILLETTI 2 teleconferences. 3 A. Well, I was primarily referring 4 to -- so if you read the full sentence 5 there, Albert has effectively changed 6 my role, abruptly taken away my 7 leadership over the conferences, and 8 now seemingly any agency over 9 teleconferences. 10 So that's discussing a full 11 range of events that occurred. 12 Q. And by agency over telephone 13 conferences in your e-mail to 14 Priscilla, you mean your leadership or 15 control over teleconferences? 16 A. Sure. 17 Q. Okay. And back to the e-mail 18 from Albert where he says your focus is 19 one hundred percent on teleconferences, 20 in that statement itself, was there 21 anything in there that led you to 22 believe you would have a deteriorated 23 role concerning teleconferences? 24 A. This was in conjunction with 25 Rutwik's overreach into the</p>	<p>Page 66</p> <p>1 V. VILLETTI 2 Is there anything in this 3 exchange, other than maybe causing 4 anxiety about seeing this sort of 5 e-mail from your boss's boss, that 6 would have made you think that Albert 7 was acting this way because you are a 8 woman, in this exchange, Exhibit M? 9 A. I don't know. I haven't seen 10 his exchanges with other women or men. 11 Q. Did you talk to Bouker about his 12 e-mail communications with Albert? 13 A. Did I talk to Bouker -- 14 Q. About Bouker's e-mail 15 communications with Albert? 16 A. No. 17 Q. Bouker never said to you, in 18 effect, Albert can be pretty nasty in 19 e-mails or something like that? 20 A. No. 21 Q. This March 1st exchange with 22 Albert, did you speak with Albert again 23 about Boston? 24 A. No. I wasn't afforded the 25 opportunity to.</p>
<p>Page 67</p> <p>1 V. VILLETTI 2 teleconferences. 3 Q. The statement to Priscilla about 4 you seemingly losing agency over 5 teleconferences, that was meant to 6 reflect Rutwik's resurping that role? 7 A. Yes. It wasn't just referencing 8 the call and e-mail from Albert, it was 9 referencing the interference from 10 Rutwik. 11 Q. Okay. And there is at least two 12 e-mails in this exchange with Albert 13 where he sends you nothing but question 14 marks. 15 Do you see that? 16 A. Yes. 17 Q. And Albert was your boss at the 18 time, correct, one of your bosses? 19 A. Albert was my boss's boss. 20 Q. Right. 21 So I would imagine seeing an 22 e-mail like that from Albert would have 23 caused some anxiety, correct? 24 A. Yes. It's unstable. 25 Q. Right.</p>	<p>Page 69</p> <p>1 V. VILLETTI 2 Q. And did you seek out that 3 opportunity? 4 A. I was told that there would be a 5 meeting arranged. 6 Q. This would be a meeting between 7 you and Albert? 8 A. Yes. 9 Q. And who told you that there 10 would be a meeting? 11 A. I believe Albert did. 12 Q. And how did he tell you that? 13 A. On the call. 14 Q. So March 1st, you had both 15 e-mail and telephone communications 16 with Albert? 17 A. Yes. 18 Q. And during one of those 19 telephone communications, Albert told 20 you that, essentially, when you got 21 back to New York, you would have a 22 meeting? 23 A. Yes. 24 Q. And did he give you an idea of 25 when that meeting would occur?</p>

<p style="text-align: right;">Page 70</p> <p>1 V. VILLETTI 2 A. No. 3 Q. Did he give you a sense of 4 anyone else might be attending that 5 meeting? 6 A. No. 7 Q. And did that meeting ultimately 8 ever occur? 9 A. No. 10 Q. When you returned to New York, 11 did you inquire about having the 12 meeting? 13 A. I may have. 14 Q. And who did you ask? 15 A. I would have asked Daniella 16 likely who was the scheduler. 17 Q. And what response did Daniella 18 give you? 19 A. I don't know. 20 Q. Did you speak with Bouker about 21 your exchange with Albert concerning 22 Boston? 23 A. Yes. 24 Q. And how did you have that 25 communication with Bouker?</p>	<p style="text-align: right;">Page 72</p> <p>1 V. VILLETTI 2 Bouker? 3 A. That Albert didn't seem to have 4 the context for the trip. 5 Q. As to why your presence was 6 necessary? 7 A. Yes. 8 Q. And in your 11:28 a.m. e-mail in 9 Exhibit M, you attempted to give him 10 that context? 11 A. Yes. 12 Q. And his reply was still from now 13 on your focus is a hundred percent on 14 teleconferences, correct? 15 A. Yes. 16 Q. When you spoke to Bouker about 17 your exchange with Albert, did you 18 express to Bouker any concerns that 19 Albert's conduct reflected gender 20 discrimination? 21 A. Could you -- 22 Q. Sure. 23 You and Albert had this e-mail 24 exchange March 1st? 25 A. Yes.</p>
<p style="text-align: right;">Page 71</p> <p>1 V. VILLETTI 2 A. I had a conversation with him 3 when he was back. 4 Q. When Bouker returned to the 5 office? 6 A. Yes. 7 Q. And when did that occur? 8 A. Sometime after the Boston trip. 9 Q. Anything more specific? 10 A. I don't remember details. 11 Q. And you spoke with Bouker in 12 person? 13 A. Yes. Yes, I spoke to him in 14 person. 15 Q. And what did you tell Bouker 16 about your exchange with Albert 17 concerning Boston? 18 A. Actually, I also spoke to him by 19 e-mail I believe. 20 Q. Okay. So you had communications 21 with Bouker about your experiences with 22 Albert concerning the Boston trip, 23 correct? 24 A. Yes. 25 Q. And what did you express to</p>	<p style="text-align: right;">Page 73</p> <p>1 V. VILLETTI 2 Q. Sometime thereafter, you talked 3 to Bouker about it? 4 A. Yes. 5 Q. When you talked to Bouker about 6 it, did you tell Bouker I think Albert 7 did this to me because I'm a woman or 8 something to that effect? 9 A. I don't recall. 10 Q. Do you have a last name for 11 Daniella? 12 A. No. 13 Q. And she is a scheduler? 14 A. She was an assistant/scheduler. 15 Q. Whose assistant was she? 16 A. I don't know. I imagine 17 Albert's. 18 Q. Other than Daniella, did you 19 speak with anyone else about having a 20 meeting with Albert? 21 A. I don't remember. 22 Q. Did you -- before you sent the 23 e-mail to Priscilla, did you speak with 24 Priscilla about your exchange with 25 Albert on Boston?</p>

<p style="text-align: right;">Page 74</p> <p>1 V. VILLETTI 2 A. Yes. 3 Q. Okay. When did you speak with 4 Priscilla? 5 A. I spoke with her immediately 6 after I spoke with Albert. 7 Q. And how did you speak with 8 Priscilla? 9 A. On the phone. 10 Q. And what did you tell Priscilla? 11 A. I just told her what had 12 occurred. 13 Q. And what did Priscilla have to 14 say in response? 15 A. That it was not uncommon for 16 Albert to misplace his anger. 17 Q. Do you know what she meant by 18 that? 19 A. I don't. 20 Q. Was it your understanding that 21 Albert was angry at someone other than 22 yourself? 23 A. Yes. At Bouker. 24 Q. And Albert was, at least in 25 Priscilla's opinion, taking it out on</p>	<p style="text-align: right;">Page 76</p> <p>1 V. VILLETTI 2 A. Yes. 3 Q. You have, okay. 4 And under what circumstances? 5 A. My attorney showed me a copy. 6 Q. Prior to your attorney showing 7 you a copy, had you ever seen the 8 e-mail exchange depicted in Exhibit N 9 before? 10 A. No. 11 Q. Were you aware that that e-mail 12 exchange had occurred? 13 A. No. 14 Q. This being your second time 15 seeing it, what do you understand 16 Exhibit N to be? 17 A. Jessica seems to have some issue 18 with me and she is discussing that with 19 Bouker. 20 Q. Was Jessica a supervisor of 21 yours or were you considered on the 22 same level? 23 A. The same level. 24 Q. And Jessica's concern here to 25 Bouker is first about reportedly your</p>
<p style="text-align: right;">Page 75</p> <p>1 V. VILLETTI 2 you? 3 A. Yes. 4 Q. And why would Albert have been 5 mad at Bouker? 6 A. Because he was skiing. 7 Q. When you were in Boston, where 8 was Bouker? 9 A. Bouker was skiing. 10 Q. Coincidentally with Albert; was 11 that the same ski trip? 12 A. Yes. 13 MR. GRECH: N, please. 14 - - - 15 (Whereupon, Defendant's 16 Exhibit N, an e-mail exchange, 17 was marked for identification.) 18 - - - 19 Q. Ms. Villette, we are showing you 20 what's been marked as Defendant's N. 21 If you could take a moment to look at 22 that, please (handing). 23 A. (Witness complied). 24 Q. Ms. Villette, have you ever seen 25 Defendant's Exhibit N before?</p>	<p style="text-align: right;">Page 77</p> <p>1 V. VILLETTI 2 absence from the office? 3 A. Appears so. 4 Q. And she said I'm sure you have 5 also noticed, to Bouker, that she's 6 barely done any work too. 7 Would Jessica have had any way 8 to review your work? 9 A. No. 10 Q. Would Bouker? 11 A. Yes. 12 Q. Jessica continues: Ms. Villette 13 has also taken upon herself to plan to 14 attend just about any and all 15 healthcare events. And this e-mail was 16 March 1st. 17 MR. LICHTEN: Is it 18 March 1st? 19 MR. GRECH: I'm sorry. 20 Forgive me. February 28th. 21 Thank you, Stuart. 22 Q. This statement is in an e-mail 23 dated February 28th. 24 Either when you first saw 25 Exhibit N or now, which healthcare</p>

<p>1 V. VILLETTI 2 events did you think Jessica was 3 referring to? 4 A. I don't know. 5 Q. Was the Boston trip coming up 6 shortly after this February 28th 7 e-mail? 8 A. Yes. 9 Q. And in the e-mail, Jessica says 10 she just left at 3:00 p.m. today to 11 take a flight to Boston for this one 12 lunch meeting at 12:00 p.m. tomorrow. 13 You see that? 14 A. Yes. 15 Q. Was this lunch meeting in Boston 16 the same subject of your e-mail 17 exchange with Albert? 18 A. Yes. 19 Q. Who is Nick Smith? 20 A. He would have been a Guidepoint 21 employee in Boston. 22 Q. Guidepoint has a Boston office 23 or had a Boston office in 24 February 2018? 25 A. I believe so.</p>	<p>Page 78</p> <p>1 V. VILLETTI 2 referring to there? 3 A. No idea. 4 Q. Have you ever had an exchange 5 with Justin where you felt you were 6 rude to him? 7 A. Justin is one of my best 8 friends. 9 Q. Still? 10 A. Yes. 11 Q. Did Justin ever come to you and 12 say you were rude and demoralized him 13 in front of Guidepoint employees? 14 A. Never. 15 Q. You maintain a friendship with 16 Justin today? 17 A. Yes. 18 Q. When was the last time you spoke 19 to Justin? 20 A. He recently got engaged, so I 21 congratulated him for that. 22 Q. And when did you congratulate 23 him? 24 A. Sometime in the last couple of 25 weeks.</p>
<p>Page 79</p> <p>1 V. VILLETTI 2 Q. What other Guidepoint employees 3 were at the Boston meeting? 4 A. I don't remember. 5 Q. Was it just you? 6 A. No. There was one or two other 7 people. 8 Q. And you don't remember who they 9 were? 10 A. No. 11 Q. Were those one to two others 12 from the New York office or the Boston 13 office? 14 A. The Boston office. 15 Q. And Jessica continues, just to 16 keep Bouker in the loop, Ms. Villette 17 completely demoralized Justin in front 18 of the whole team. It was uncalled for 19 and rude. And I think it really hurt 20 Justin. 21 Do you see that? 22 A. Yes. 23 Q. Is that Justin Ruiz? 24 A. Yes. 25 Q. Do you know what Jessica is</p>	<p>Page 81</p> <p>1 V. VILLETTI 2 Q. And you have maintained 3 communications with Justin since your 4 separation from Guidepoint? 5 A. Periodically, yes. 6 Q. And Justin is still with 7 Guidepoint? 8 A. I believe so. 9 Q. In what capacity? 10 A. He is creating content. 11 Q. Healthcare content? 12 A. No. 13 Q. Do you know what kind of 14 content? 15 A. When I was there, he covered a 16 variety of sectors; consumer, tech, 17 gaming, other areas. 18 Q. And Bouker replies to this 19 e-mail from Jessica saying thanks, 20 disappointed, but not surprised. 21 Do you see that? 22 A. Yes. 23 Q. Before February 28th of 2018, 24 had Bouker ever brought to you concerns 25 that employees had thought you had been</p>

<p style="text-align: right;">Page 82</p> <p>1 V. VILLETTI 2 rude or demoralizing to them? 3 A. I don't recall. 4 Q. Did you have conversations with 5 anyone at Guidepoint about you being 6 rude or demoralizing to other 7 employees? 8 A. I don't recall having any 9 conversations with anyone about that. 10 Q. Do you recall having 11 conversations in which you were rude or 12 demoralizing to an employee? 13 A. I can't think of specific 14 instances. But I know that if I had 15 done such a thing, I would have 16 apologized for it. 17 Q. And Bouker says that he will 18 deal with it. 19 Did Bouker bring this concern of 20 Jessica's to your attention? 21 A. No. 22 Q. And Jessica's reply is can I 23 suggest we slap her with a PIP and 24 please take away her privilege to 25 travel, at least temporarily, until she</p>	<p style="text-align: right;">Page 84</p> <p>1 V. VILLETTI 2 Q. Would Bouker? 3 A. Yes. 4 Q. Would Jessica have had the 5 authority to take away your travel 6 privileges? 7 A. No. 8 Q. Would Bouker? 9 A. Yes. 10 Q. And here Jessica's condition is 11 until you get your performance up. 12 Do you see that? 13 A. Yes. 14 Q. How was your performance in late 15 February, early March of 2018? 16 A. It was -- I was performing well. 17 Q. And Bouker's reply is how do we 18 document this and do the right way. 19 Do you see that? 20 A. Yes. 21 Q. And it appears -- 22 MR. LICHTEN: That's not a 23 reply to -- 24 MR. GRECH: I'm sorry. Fair 25 enough.</p>
<p style="text-align: right;">Page 83</p> <p>1 V. VILLETTI 2 gets her performance up. 3 Do you see that? 4 A. Yes. 5 Q. Ms. Villette, do you know what a 6 PIP is? 7 A. No. 8 Q. Have you ever heard of a 9 performance improvement plan? 10 A. Yes. 11 Q. Okay. Do they do performance 12 improvement plans at Guidepoint? 13 A. Not to my knowledge. 14 Q. Were you ever placed on a 15 performance improvement plan at 16 Guidepoint? 17 A. No. 18 Q. Was there ever a threat to place 19 you on a performance improvement plan 20 at Guidepoint? 21 A. No. 22 Q. Would Jessica have the authority 23 to put you on a performance improvement 24 plan? 25 A. No.</p>	<p style="text-align: right;">Page 85</p> <p>1 V. VILLETTI 2 Q. The next e-mail that appears on 3 this Exhibit N is an e-mail from Bouker 4 to Priscilla. 5 Do you see that? 6 A. Yes. 7 Q. And here it's forwarding the 8 prior exchange? 9 A. Yes. 10 Q. And this is Bouker asking 11 Priscilla how do we document this and 12 do the right way. 13 Do you see that? 14 A. Yes. 15 Q. Did you ever have any 16 conversations with Priscilla about 17 Jessica's concerns? 18 A. No. 19 Q. Did you ever have any 20 conversations with Priscilla about you 21 being placed on a performance 22 improvement plan? 23 A. No. 24 Q. Did you ever have any 25 conversations with Priscilla about your</p>

<p>1 V. VILLETTI 2 performance? 3 A. No. 4 Q. That you are aware of, were any 5 of Jessica's concerns ever documented 6 as Bouker requested? 7 A. I don't know. 8 Q. And this is the same Jessica 9 that you felt was mistreated based upon 10 her gender, correct? 11 A. Yes. 12 MR. GRECH: O. 13 - - - 14 (Whereupon, Defendant's 15 Exhibit O, an e-mail exchange, 16 was marked for identification.) 17 - - - 18 (Whereupon, a recess was 19 taken at this time.) 20 - - - 21 Q. Ms. Villetti, can you just look 22 back at Exhibit M, please, the e-mail 23 exchange with Albert? 24 A. Yes. 25 Q. Page 2 in that exchange,</p>	<p>Page 86</p> <p>1 V. VILLETTI 2 A. Yes. 3 Q. What other performance metrics 4 were you given? 5 A. I wasn't given any. 6 Q. And when we were talking about 7 Exhibit N, which was Jessica's e-mail, 8 right? 9 A. Yes. 10 Q. And she had said we have to get 11 Valentia's performance up. 12 Do you recall that? 13 A. Yes. 14 Q. And you had said your 15 performance was good, right? 16 A. Yes. 17 Q. And how were you measuring your 18 performance at that point? 19 A. How was I measuring my own 20 performance? 21 Q. Correct. To come to the opinion 22 that it was good. 23 A. The numbers spoke for 24 themselves. 25 Q. And what numbers in particular?</p>
<p>Page 87</p> <p>1 V. VILLETTI 2 Bates-stamped page 16, there is an 3 e-mail from Albert to you and Priscilla 4 dated March 1st at 11:11 a.m. 5 You see that? 6 A. Yes. 7 Q. And Albert writes that -- I see 8 he misspelled your name there -- 9 Valentia, Valentia, will be finishing 10 up meetings in Boston and will be in 11 the New York office tomorrow to work on 12 teleconferences. The goal is 1.5 to 2 13 teleconferences per week in healthcare. 14 Do you see that? 15 A. Yes. 16 Q. Did you meet that goal when you 17 returned from Boston? 18 A. Yes. 19 Q. Did you understand that to be 20 one of your performance metrics? 21 A. At that moment, yes. 22 Q. Okay. And we had talked before 23 about your difficulties in getting 24 clarification on your performance 25 metrics, right?</p>	<p>Page 89</p> <p>1 V. VILLETTI 2 A. The number of attendees I had on 3 my teleconferences and the feedback I 4 was getting from the teleconferences. 5 Q. When Albert said the goal is 1.5 6 to 2 teleconferences per week in 7 healthcare, was that meant to measure 8 your performance or the entire team? 9 A. I don't know. I took it to mean 10 mine. 11 Q. And how many teleconferences 12 were you conducting per week before the 13 Boston trip? 14 A. I would say it averaged to 15 around there. 16 Q. 1.5 to 2? 17 A. Per week, yeah. 18 Q. Ms. Villetti, I'm going to show 19 you what's been marked as Defendant's 20 Exhibit O (handing). 21 Have you had a chance to look at 22 Defendant's O -- please take a chance 23 to look at -- please take an 24 opportunity to look at Defendant's O. 25 A. Yes.</p>

<p style="text-align: right;">Page 90</p> <p>1 V. VILLETTI 2 Q. All right. Do you recognize it? 3 A. No. 4 Q. Have you ever seen it before? 5 A. No. 6 Q. What does it appear to be? 7 A. It appears to be a letter from 8 Jessica complaining about me on the day 9 I was fired. 10 Q. And this is the same Jessica 11 that had the e-mail we talked about 12 before? 13 A. Yes. 14 Q. And the same Jessica you felt 15 that was mistreated because of her 16 gender? 17 A. Yes. Those two things are not 18 related. 19 Q. And she wrote an e-mail to 20 Priscilla on March 19th, which was the 21 date of your termination, correct? 22 A. Yes. 23 Q. And the e-mail reads I cannot 24 work with Valentia anymore. She leaves 25 early, comes in late practically every</p>	<p style="text-align: right;">Page 92</p> <p>1 V. VILLETTI 2 A. Not really. 3 Q. And how -- 4 A. I had one in-person meeting with 5 her a week when she was in the office 6 with the team. 7 Q. Did Jessica have any authority 8 to set your schedule? 9 A. Absolutely not. 10 Q. Who did? 11 A. Bouker. 12 Q. And Albert? 13 A. By extension, yes. 14 Q. Anybody else? 15 A. Not to my knowledge. 16 Q. Did Jessica ever raise any 17 concerns with you about you're not 18 doing your work? 19 A. After I returned from Boston, 20 there was quite a bit of chaos in the 21 team. She was bickering with me as 22 well as with everyone else. And I was 23 just told that she was quote, unquote 24 freaking out. 25 Q. And who else was Jessica having</p>
<p style="text-align: right;">Page 91</p> <p>1 V. VILLETTI 2 day. She has every excuse in the book 3 for why she's not doing her work. She 4 creates so much more drama among the 5 team. She is just so awful to work 6 with. 7 I am begging you to please let 8 this woman go. I am practically doing 9 all of her work as it is. If she 10 doesn't leave soon, I can guarantee a 11 lot of my team will quit. 12 Do you at least see where it 13 says that there? 14 A. Yes. 15 Q. Okay. Had Jessica ever raised 16 with you her concerns about your 17 leaving early? 18 A. Jessica was not even working 19 primarily in the New York office. 20 Q. And where -- 21 A. So I interacted with her maybe 22 once a week, twice a week. 23 Q. And how would you have those 24 interactions? Were they in-person in 25 the office?</p>	<p style="text-align: right;">Page 93</p> <p>1 V. VILLETTI 2 these exchanges with other than 3 yourself? 4 A. She was freaking out at everyone 5 on the team. 6 Q. Everyone on the team? 7 A. Yes. 8 Q. And who coined the phrase 9 freaking out for Jessica? 10 A. I don't remember who initiated 11 it. But I heard that phrase several 12 times. 13 Q. And what was your understanding 14 as to why Jessica was freaking out? 15 A. I was told that she had been 16 subject to Albert's wrath before. And 17 that when Albert would zoom on a group, 18 she would freak out. 19 Q. Did Jessica explain to you how 20 she had been subject to Albert's wrath 21 before? 22 A. I don't recall. 23 Q. Who told you that Jessica had 24 been subject to Albert's wrath before? 25 A. It came up in conversations</p>

<p>1 V. VILLETTI 2 around the office. 3 Q. With whom? 4 A. I can't tell you. 5 Q. What were the circumstances in 6 which Jessica had previously 7 experienced Albert's wrath? 8 A. I don't know the specifics. 9 Q. Did you understand Jessica's 10 concern to be since Albert got mad at 11 you in Boston that he was then going to 12 take it out on the team? 13 A. Yes. Albert was not just mad at 14 me. He was also mad at Bouker. 15 Q. For catching him skiing? 16 A. Yes. 17 Q. So he was mad at the two heads 18 of the team? 19 A. Appears so. 20 Q. And there was freaking out among 21 the team members that there would be 22 fallout from that? 23 A. One would imagine. 24 Q. Did any of those conversations 25 where there was team chaos after Boston</p>	<p>Page 94</p> <p>1 V. VILLETTI 2 eventually asked Priscilla to fire you? 3 A. No. 4 Q. Did Priscilla ever bring these 5 concerns of Jessica to your attention? 6 A. I don't recall. 7 Q. And you see Jessica's statement, 8 I'm practically doing all of her work 9 as it is? 10 You at least see that statement? 11 A. Yes. 12 Q. Okay. Were there instances in 13 which Jessica was doing your work? 14 A. No. Jessica could not do my 15 work. 16 Q. And why not? 17 A. She is not a healthcare 18 specialist. 19 Q. And what role did Jessica fill? 20 A. She was a logistics and events 21 manager. 22 Q. Was it ever brought to your 23 attention that anyone else other than 24 Jessica was doing your work? 25 A. No.</p>
<p>1 V. VILLETTI 2 focus specifically on your work? 3 A. No. There was a team meeting 4 where we discussed everyone's role and 5 how the expectation was for everyone to 6 produce more. 7 Q. And is this the same team 8 meeting when we were talking about your 9 e-mail with Albert? 10 A. Sorry? 11 Q. Correct me if I'm wrong. After 12 -- when we were talking about the 13 e-mail exchange with Albert in 14 Boston -- 15 A. Yes. 16 Q. -- you said you had 17 conversations with team members after 18 that, correct? 19 A. Yes. 20 Q. Is this the same team meeting? 21 A. Possibly. 22 Q. Had you ever been accused of 23 creating drama among the team? 24 A. No. 25 Q. Were you aware that Jessica</p>	<p>Page 95</p> <p>1 V. VILLETTI 2 says if she, meaning you, doesn't leave 3 soon, Jessica can guarantee a lot of my 4 team will quit. 5 Who was part of Jessica's team 6 at that point? 7 A. I assume she is referencing the 8 four girls who technically reported to 9 Bouker. 10 Q. Had any of those girls come to 11 you with complaints about your conduct? 12 A. No. 13 Q. And who were these four girls? 14 A. There was Sarah, Amrutha, Gabby, 15 and Kendall. None of whom are still 16 there. 17 MR. LICHTEN: Are they older 18 than 18? 19 THE WITNESS: Yes. 20 MR. LICHTEN: So then can we 21 refer to them as women? 22 MR. GRECH: That's fair. 23 Q. The four women on Jessica's 24 team?</p>

<p style="text-align: right;">Page 98</p> <p>1 V. VILLETTI 2 A. Yes. 3 Q. Other than the women themselves, 4 had anyone brought a complaint on their 5 behalf to you? 6 A. Not that I recall, no. 7 Q. Jessica said they would quit. 8 And you said they are not there 9 anymore. 10 So why are they not there 11 anymore? 12 A. They have either quit or been 13 fired. 14 Q. Okay. Sarah, what happened to 15 Sarah? 16 A. I don't know the specifics. 17 Q. Did she quit or was she fired? 18 A. I believe she quit. 19 Q. Do you know why? 20 A. No. 21 Q. Amrutha? 22 A. I don't know. 23 Q. Did she quit or was she fired? 24 A. Don't know. 25 Q. Gabby?</p>	<p style="text-align: right;">Page 100</p> <p>1 V. VILLETTI 2 Q. Do you recall what you talked 3 about during that second meeting with 4 Priscilla? 5 A. No. 6 Q. Did you talk about this 7 complaint from Jessica? 8 A. Not to my recollection. 9 Q. Did you talk about work 10 distribution within your team? 11 A. I don't recall the specifics of 12 the conversation. 13 Q. Did you talk about concerns over 14 your attendance? 15 A. Not that I recall. 16 Q. Did you talk about any concerns 17 about you're creating drama in the 18 team? 19 A. Not that I recall. 20 Q. Did Priscilla tell you during 21 this meeting that there was a concern 22 that team members were going to quit? 23 A. Not that I recall. 24 MR. GRECH: P, Exhibit P. 25 - - -</p>
<p style="text-align: right;">Page 99</p> <p>1 V. VILLETTI 2 A. Don't know. 3 Q. But not there anymore? 4 A. No. 5 Q. You don't know whether Gabby 6 quit or was terminated? 7 A. No. 8 Q. What about Kendall? 9 A. Don't know. She is not there. 10 Q. Is Jessica still there? 11 A. No. 12 Q. Is there an events team that you 13 are aware of? 14 A. Yes. 15 Q. Do you recall when we were 16 talking about your e-mail complaint to 17 Priscilla and you had a meeting with 18 her that day? 19 A. Yes. 20 Q. And you had a second meeting 21 with her that you remember? 22 A. Yes. 23 Q. Do you recall when that second 24 meeting was? 25 A. No.</p>	<p style="text-align: right;">Page 101</p> <p>1 V. VILLETTI 2 (Whereupon, Defendant's 3 Exhibit P, plaintiff's October 4 27, 2018 letter was marked for 5 identification.) 6 - - - 7 Q. Ms. Villette, we are showing you 8 what's been marked as Defendant's 9 Exhibit P, as in Peter, for the 10 purposes of this deposition. You can 11 just take an opportunity to look at 12 that (handing). 13 A. Yes. 14 Q. Have you ever seen Exhibit P 15 before? 16 A. Yes. 17 Q. And when did you see Exhibit P 18 before? 19 A. Sometime after it was filed. 20 Q. Okay. And this was a letter 21 sent by Mr. Lichten to the EEOC? 22 A. Appears to be, yes. 23 Q. And you see the reference in 24 there, first paragraph, second 25 sentence, to a companion charging</p>

<p style="text-align: right;">Page 102</p> <p>1 V. VILLETTI 2 parties case? 3 A. Uh-huh. 4 Q. Do you know who that companion 5 party is? 6 A. That would be Dr. Jibril. 7 Q. Okay. And at what point did you 8 and Dr. Jibril decide you would be 9 companion parties in this litigation? 10 A. Sometime after I filed. 11 Q. After you filed what? 12 A. My complaint with the EEOC. 13 Q. Do you know whether your counsel 14 received a case file from the EEOC in 15 response to this request? 16 A. I don't know. 17 MR. GRECH: To the extent it 18 hasn't been produced, we are 19 going to follow up with a request 20 in writing for the EEOC case 21 file. 22 MR. LICHTEN: Okay. 23 Anything I got I turned over. 24 MR. GRECH: Okay. 25 MR. LICHTEN: I don't know</p>	<p style="text-align: right;">Page 104</p> <p>1 V. VILLETTI 2 Q. And here you identify your 3 occupation as an entrepreneur; is that 4 correct? 5 A. Yes. 6 Q. In what respects did you operate 7 as an entrepreneur in 2018? 8 A. I was working on the company 9 that I discussed before producing 10 protein bars. 11 Q. That's KIOKO? 12 A. Yes. 13 Q. Did you serve as an entrepreneur 14 in any other respects in 2018 or than 15 of KIOKO? 16 A. No. 17 Q. And if, Ms. Villetti, you could 18 look at the last page of Exhibit Q. 19 It's a 1099-G form. 20 Do you see that? 21 A. Yes. 22 Q. Does this reflect your 23 unemployment compensation? 24 A. Yes. 25 Q. And that amount was \$10,005.</p>
<p style="text-align: right;">Page 103</p> <p>1 V. VILLETTI 2 if I got one. 3 MR. GRECH: All right. We 4 will follow up in writing. 5 Q. 6 - - - 7 (Whereupon, Defendant's 8 Exhibit Q, a 1040 form, was 9 marked for identification.) 10 - - - 11 Q. Ms. Villetti, we are showing you 12 what's been marked as Defendant's 13 Exhibit Q for this deposition 14 (handing). 15 Do you recognize that document? 16 A. Yes. 17 Q. What is it? 18 A. It is my 2018 tax filing. 19 Q. And when were you separated from 20 Guidepoint? 21 A. March of 2018. 22 Q. Did Guidepoint provide you with 23 a W-2 form for the time that you worked 24 for them in 2018? 25 A. Yes.</p>	<p style="text-align: right;">Page 105</p> <p>1 V. VILLETTI 2 Do you see that? 3 A. Yes. 4 Q. Is that an accurate reflection 5 of the unemployment compensation you 6 received in 2018? 7 A. Yes. 8 Q. And was that compensation given 9 to you as a result of your termination 10 from Guidepoint? 11 A. Yes. 12 Q. And, Ms. Villetti, if you could 13 turn to the second page of the 1040 14 form, the main form? 15 A. Yes. 16 Q. Line Item 1, where it asks you 17 to list your wages, salaries, tips, et 18 cetera -- 19 A. Yes. 20 Q. -- on the W-2 Form. 21 Can you see that amount? 22 A. Yes. 23 Q. \$56,359? 24 A. Yes. 25 Q. And where did you acquire those</p>

<p style="text-align: right;">Page 106</p> <p>1 V. VILLETTI 2 wages, salaries, and tips in 2018? 3 A. Guidepoint. 4 Q. When you submitted your 2018 tax 5 return, did it have a W-2 from 6 Guidepoint attached to it? 7 A. Yes. 8 Q. Did it have any other 1099s in 9 addition to the 1099-G from New York 10 State Department of Labor Unemployment? 11 A. No. 12 Q. Ms. Villette, if you could look 13 at Form 1040, Schedule 1. It's the 14 third page of Exhibit Q. 15 A. Yes. 16 Q. Line Item 17, additional income. 17 You see that? 18 A. Yes. 19 Q. It's showing a loss of \$19,835. 20 You see that? 21 A. Yes. 22 Q. And this is for rental real 23 estate, royalties, partnerships, 24 S-corporations, trusts, et cetera? 25 A. Yes.</p>	<p style="text-align: right;">Page 108</p> <p>1 V. VILLETTI 2 The corporation is called what? 3 A. Kenko, K-E-N-K-O. 4 Q. And KIOKO is the name of the 5 product? 6 A. Yes. 7 Q. That's the protein bar? 8 A. Yes. 9 Q. So it's Kenko as the 10 S-corporation? 11 A. Yes. 12 Q. And what is your status with 13 Kenko? 14 A. I'm the CEO. 15 Q. Okay. The 19,835 loss, that's 16 attributable solely to the Kenko 17 operating losses, correct? 18 A. Yes. 19 Q. There are no rental real estate 20 associated with that? 21 A. No. 22 Q. Royalties? 23 A. No. 24 Q. Partnerships? 25 A. No.</p>
<p style="text-align: right;">Page 107</p> <p>1 V. VILLETTI 2 Q. Can you explain the loss of 3 \$19,835 you experienced in 2009 -- 2018 4 in that category? 5 A. KIOKO is an S-corporation. 6 Those are operating losses. 7 Q. That you claim on your personal 8 tax returns? 9 A. Yes. 10 Q. And do you see in Line Item 17, 11 they request any attachment of Schedule 12 E? 13 A. Yes. 14 Q. Did your 2018 tax returns -- was 15 it accompanied by a Schedule E? 16 A. Yes. 17 MR. GRECH: I'm going to 18 call for production of the 19 Schedule E. 20 Q. The \$19,835 loss, that was 21 attributed solely to KIOKO as an 22 S-corporation? 23 A. KIOKO is the product. Yes. The 24 corporation is called Kenko. 25 Q. I'm sorry.</p>	<p style="text-align: right;">Page 109</p> <p>1 V. VILLETTI 2 Q. Trusts? 3 A. No. 4 Q. And you still work as the CEO of 5 Kenko today? 6 A. Yes. 7 Q. And have there been any changes 8 to your compensation as CEO of Kenko 9 since our last meeting? 10 A. No. 11 Q. Kenko is still not profitable? 12 A. No. 13 Q. Are there any other officers of 14 Kenko? 15 A. Yes. There is a CFO and a COO. 16 Q. And last time we had some 17 concern about the other founders of 18 Kenko, correct? 19 A. Yes. 20 Q. Are those other founders the 21 other officers? 22 A. One of them is. 23 MR. GRECH: To the extent 24 that there are confidentiality 25 concerns, we are going to respect</p>

<p style="text-align: right;">Page 110</p> <p>1 V. VILLETTI 2 that. And we are going to ask 3 for an identification in writing 4 subject to confidentiality, as 5 the court directed. 6 We will follow up in writing 7 with a request for the 8 identification of the officers of 9 Kenko.</p> <p>10 THE WITNESS: Yes. 11 Q. Does Kenko have any other 12 employees? 13 A. No. 14 Q. Does Kenko have an IT 15 department? 16 A. No. 17 Q. Does it sell its product on a 18 website? 19 A. Yes. It's on Amazon Prime. 20 Q. How is the product manufactured? 21 A. There is a packaging -- there is 22 a co-packer in Los Angeles. 23 Q. And Kenko -- did Kenko make 24 sales of the KIOKO bars in 2018? 25 A. Yes.</p>	<p style="text-align: right;">Page 112</p> <p>1 V. VILLETTI 2 A. Possibly. Or it will be 3 directly on our own website. 4 Q. So you suffered \$19,835 in 5 operating losses attributed to Kenko in 6 2018? 7 A. Yes. 8 Q. And those -- and what were the 9 makeup of those losses? 10 A. There is quite a bit of 11 promotional and sampling and R&D in the 12 early stages of a food company. 13 Q. And would the 19,835 reflect 14 your expenses associated with those? 15 A. Yes. 16 Q. Promotions and sampling? 17 A. It would be sampling, R&D, 18 marketing. 19 Q. Did Kenko file its own tax 20 return in 2018? 21 A. Yes. 22 Q. Does Dr. Jibril have any 23 affiliation with Kenko? 24 A. No. 25 MR. GRECH: I'm going to</p>
<p style="text-align: right;">Page 111</p> <p>1 V. VILLETTI 2 Q. And do you have a sense of the 3 numbers, units sold? 4 A. Not off the top of my head. 5 Q. How long has Kenko been in 6 operation? 7 A. Kenko was incorporated in 2016. 8 Q. Does Kenko have any business 9 other than the sale of the KIOKO bars? 10 A. Not currently, no. 11 Q. Did it at any point? 12 A. No. 13 Q. Is there plans for it to have 14 other businesses but the KIOKO bars? 15 A. Yes. 16 Q. And what are those other 17 businesses? 18 A. Other nutritional products. 19 Q. And how far away is Kenko from 20 offering these other nutritional 21 products in terms of time? 22 A. We are still in R&D. I couldn't 23 say. 24 Q. Would those also be available on 25 Amazon Prime?</p>	<p style="text-align: right;">Page 113</p> <p>1 V. VILLETTI 2 take a five-minute break. 3 - - - 4 (Whereupon, a recess was 5 taken.) 6 - - - 7 MR. GRECH: And with that, 8 Ms. Villetti, we are going to 9 conclude your deposition. And I 10 just want to thank you for your 11 time for appearing and your 12 answering our questions. 13 THE WITNESS: Thank you. 14 (Time noted: 4:48 p.m.)</p>

Page 114

INSTRUCTIONS TO WITNESS

Please read your deposition over carefully and make any necessary corrections. You should state the reason in the appropriate space on the errata sheet for any corrections that are made.

After doing so, please sign the errata sheet and date it.

You are signing same subject to the changes you have noted on the errata sheet, which will be attached to your deposition.

It is imperative that you return the original errata sheet to the deposing attorney within thirty (30) days of receipt of the deposition transcript by you. If you fail to do so, the deposition transcript may be deemed to be accurate and may be used in court.

A C K N O W L E D G E M E N T
STATE OF NEW YORK)
:SS
COUNTY OF)

I, VALENTIA VILLETTI, hereby certify that I have read the transcript of my testimony taken under oath on NOVEMBER 14, 2019, that the transcript is a true, complete and correct record of what was asked, answered and said during my testimony under oath, and that the answers on the record as given by me are true and correct, except for the corrections or changes in form or substance, if any, noted in the attached Errata Sheet.

VALENTIA VILLETTI

Signed and subscribed to
before me, this _____ day
of _____,

Notary Public

Page 115

Page 117

ERRATA

PAGE LINE CHANGE

INDEX OF WITNESSES	
WITNESS: VALENTIA VILLETTI	
EXAMINATION BY	PAGE
MR. GRECH	4

INDEX OF EXHIBITS		
EXHIBIT	DESCRIPTION	PAGE
H	EMPLOYEE AGREEMENT	6
I	EMPLOYMENT POLICIES	11
J	RECEIPT FOR EMPLOYEE HANDBOOK	11
K	E-MAIL EXCHANGE	22
L	E-MAIL EXCHANGE	53
M	E-MAIL EXCHANGE	63
N	E-MAIL EXCHANGE	75
O	E-MAIL EXCHANGE	86
P	PLAINTIFF'S OCTOBER 27, 2018 LETTER	101
O	1040 FORM	103

INDEX OF REQUESTS

DESCRIPTION	PAGE
ANY WRITTEN COMMUNIQUÉ FROM PLAINTIFF TO BOUKER COMPLAINING ABOUT HOSTILE WORK ENVIRONMENT CREATED BY RUTWIK	57
EEOC CASE FILE	102
SCHEDULE E ATTACHMENT	107
IDENTIFICATION OF THE OFFICERS OF KENKO IN WRITING SUBJECT TO CONFIDENTIALITY	110

Page 118

1

2 C E R T I F I C A T E

3

4 I, LEAH MILLER, a shorthand reporter and
5 Notary Public within and for the State of
6 New York, do hereby certify:

7

8 That the Witness(es) whose testimony is
9 hereinbefore set forth was duly sworn by me,
10 and the foregoing transcript is a true record
11 of the testimony given by such Witness(es).

12

13 I further certify that I am not related to
14 any of the parties to this action by blood or
15 marriage, and that I am in no way interested
16 in the outcome of this matter.

17

18

19

20

21

22

23

24

25



L. Miller

Leah Miller, a Court
Reporter and Notary Public

Page 119

1

2 LAWYER'S NOTES

3 PAGE/LINE NOTE

4 _____

5 _____

6 _____

7 _____

8 _____

9 _____

10 _____

11 _____

12 _____

13 _____

14 _____

15 _____

16 _____

17 _____

18 _____

19 _____

20 _____

21 _____

22 _____

23 _____

24 _____

25 _____

A able 35:4 above-entitled 1:17 abruptly 39:17 40:17 66:6 absence 34:8 77:2 absences 19:4,8,12 28:8,12,16,18 absent 27:21 Absolutely 92:9 abusive 36:14,24 37:15,20 38:2,18 accepted 44:7 access 58:11 accommodate 6:7 accompanied 107:15 accurate 105:4 114:19 accused 95:22 acknowledgement 13:2 acknowledgements 35:17 acquire 105:25 acting 68:7 action 1:18 5:3 118:11 actions 55:14,22 addition 106:9 additional 106:16 address 4:12,23 administer 3:16 advocating 62:2 affiliation 112:23 afforded 68:24 afternoon 4:16,17 agency 39:20 65:17 65:20,25 66:8,12 67:4 aggression 36:14 38:11 aggressive 36:22 38:17,21 AGREED 3:4,9,13	agreed-upon 33:24 agreement 6:21 7:15,17,21,25 10:5,9 34:2 117:9 Albert 7:22 9:12 19:11 20:4,11 32:12 35:24 36:4 36:7 37:15,21 38:10,13 39:6,16 40:17 43:17,19 48:10,14 56:12,17 64:12,15 65:12 66:5,18 67:8,12 67:17,19,22 68:6 68:12,15,18,22,22 69:7,11,16,19 70:21 71:16,22 72:3,17,23 73:6 73:20,25 74:6,16 74:21,24 75:4,10 78:17 86:23 87:3 87:7 89:5 92:12 93:17 94:10,13 95:9,13 Albert's 37:25 42:19 55:22 64:19 72:19 73:17 93:16 93:20,24 94:7 allegations 9:21 15:14 allowed 39:7,9 Amazon 110:19 111:25 Americas 2:16 amicable 50:13 amount 33:24 104:25 105:21 Amrutha 97:15 98:21 Angeles 110:22 anger 74:16 angry 74:21 animus 10:20 answer 6:9 56:2 answered 116:10 answering 113:12	answers 116:12 anxiety 36:16 67:23 68:4 Anybody 92:14 anymore 39:8 90:24 98:9,11 99:3 apart 22:15 41:16 apologized 82:16 appear 56:14 90:6 appearing 26:5 113:11 appears 12:12 54:24 64:16 77:3 84:21 85:2 90:7 94:19 101:22 apply 4:20 appreciate 50:10 approach 62:23 appropriate 114:6 approval 42:20,24 43:2 approved 40:25 areas 81:17 Arguably 37:17 arranged 69:5 arrangement 39:13 Article 8:2,9,18 Ashlee 17:4 46:19 46:21 47:7 Ashlee's 46:25 47:12 asked 19:20 22:17 33:2 70:15 96:2 116:10 asking 85:10 asks 51:10 105:16 assistant 73:15 assistant/scheduler 73:14	attached 106:6 114:13 116:15 attachment 107:11 117:22 attempted 72:9 attempting 26:22 attend 77:14 attendance 100:14 attendees 89:2 attending 70:4 attention 24:18,25 50:21 82:20 96:5 96:23 attorney 3:20 76:5 76:6 114:15 attorneys 2:4,10,16 3:5 attributable 108:16 attributed 107:21 112:5 at-will 13:8 authority 83:22 84:5 92:7 authorized 3:15 19:24 available 16:14 111:24 Avenue 2:4,16 averaged 89:14 aware 8:5,11,19 13:16 14:21 15:3 15:8,11 21:5 54:10 58:6,10 61:25 76:11 86:4 95:25 99:13 awful 91:5 a.m 24:2 72:8 87:4	B B 117:7 back 14:9 17:7 19:25 20:14 51:3 65:21 66:17 69:21 71:3 86:22 bar 108:7 barely 77:6	barred 39:21 bars 104:10 110:24 111:9,14 based 9:23 28:23 33:11,17,23 35:9 55:22 86:9 Bates-stamped 87:2 Battery 1:11 2:10 begging 91:7 behalf 7:21 10:5 62:2 98:5 behaving 27:6,9 behavior 14:23 16:3 17:14,17 53:23 57:15 60:20 61:4 belief 18:8 believe 14:19 19:2 30:25 40:6 48:10 49:7 52:11,18 authority 83:22 84:5 92:7 authorized 3:15 19:24 belittled 35:19,22 belittling 36:8 best 5:16 80:7 bickering 92:21 bit 92:20 112:10 blood 118:11 board 10:17 13:17 bombs 37:7,13 bonus 30:8,15,23 31:2 33:14,17,20 book 91:2 boss 37:6,6 53:21 54:7 67:17,19 68:5 bosses 67:18 boss's 67:19 68:5 Boston 17:7,9,23 18:18,22 36:5,10 38:8,14 40:7,10 42:9,14 43:14,14 43:15,17 59:15,19
---	---	---	---	--	---

64:11,15 68:23 70:22 71:8,17,22 73:25 75:7 78:5 78:11,15,21,22,23 79:3,12,14 87:10 87:17 89:13 92:19 94:11,25 95:14 Bouker 16:18,24 19:15,16,24 20:2 20:4,11 21:13 27:7,20 29:17 31:12 32:15 34:3 34:11 40:23,25 43:10,11 44:21,24 48:23 53:22 54:12 54:16 55:3,7 56:4 56:15,25 57:6,11 57:16 58:2,8 60:3 60:9,22 61:8,12 61:18 62:6,12 68:11,13,17 70:20 70:25 71:4,11,15 71:21 72:2,16,18 73:3,5,6 74:23 75:5,8,9 76:19,25 77:5,10 79:16 81:18,24 82:17,19 84:2,8 85:3,10 86:6 92:11 94:14 97:10 117:20 Bouker's 28:8,12 28:16 55:21 56:20 61:23 62:23 63:8 63:11 68:14 84:17 break 6:4,11 34:14 113:2 briefly 30:4 BRIGHT 2:3 bring 50:24 82:19 96:4 bringing 50:20 broad 37:19 brought 24:15,23 46:3 81:24 96:22 98:4 build 44:10	business 44:6 45:15 46:6 111:8 businesses 111:14 111:17 C C 2:2 116:2 118:2,2 call 17:22 27:3 31:23 36:4,9 37:17,22 38:2,7 38:14,23 43:16 67:8 69:13 107:18 called 17:20,23 39:6 54:8,12 56:4 61:12 107:24 108:2 calling 29:4,5 57:23 calls 45:16 Campanella 24:21 capacity 81:9 carefully 114:5 case 9:22 102:2,14 102:20 117:21 catching 94:15 category 107:4 CATHERINE 2:18 cause 13:12 caused 67:23 causing 68:3 caution 13:7 cell 17:20,24 CEO 108:14 109:4 109:8 CEO's 16:12 certain 8:8 16:3,20 19:11 certification 3:7 certify 116:6 118:5 118:10 cetera 105:18 106:24 CFO 24:21 32:11 109:15 chain 23:20 69:15,19 71:20 81:3 communiqué 55:12	53:15 64:5 89:21 89:22 CHANGE 115:4 changed 39:17 66:5 changes 109:7 114:12 116:14 chaos 28:19 92:20 94:25 charge 3:19 charging 101:25 choice 48:8,9 chooses 20:19 circumstances 18:14 54:5 76:4 94:5 Civ 1:6 claim 107:7 clarification 27:22 27:24 30:7 32:5,8 33:3,8,10 87:24 clear 5:22 31:10 65:2 clicked 54:13 client 45:16 Coincidentally 75:10 coined 93:8 come 17:18 51:13 80:11 88:21 97:11 comes 90:25 comfortable 50:19 coming 10:16 78:5 communicate 54:16 55:6 communicated 28:7,11 44:18 63:7,11 communication 26:7 58:18 64:10 65:6 70:25 communications 43:18 57:6 58:7 58:22 68:12,15 chain 23:20 69:15,19 71:20 81:3 communiqué 55:12	concerning 32:3 51:22 52:5 57:8 63:7 66:23 70:21 71:17,22 concerns 13:22 19:2 25:5 26:2 72:18 81:24 85:17 86:5 91:16 92:17 96:5 100:13,16 109:25 conclude 113:9 conclusion 17:19 35:9 condescending 18:5 20:9 condition 84:10 conduct 14:22 16:8 16:20,25 17:9 72:19 97:12 conducted 41:24 conducting 89:12 conference 42:10 conferences 39:18 40:18,21,24 41:4 41:7,9 42:25 65:18 66:7,13 confidentiality 109:24 110:4 117:23 confront 20:19 congratulate 80:22 congratulated 80:21 conjunction 66:24 considered 16:4,8 16:21 17:8 76:21 consult 43:6,8 consultant 26:12 26:18 consultants 26:14 consulted 18:24 consulting 13:24 14:6 consumer 81:16 content 34:21 39:11 41:20 45:3
--	--	--	--

45:6,9 56:5 81:10 81:11,14 contents 54:12,20 context 18:6 72:4 72:10 CONTINUED 1:15 continues 34:6 47:23 77:12 79:15 continuing 36:13 continuous 23:17 continuously 35:18 contract 8:16 control 66:15 conversation 8:25 9:8 18:3 20:2,6 32:24 60:19 64:15 71:2 100:12 conversations 17:3 18:9 25:3,17 58:24 59:9 82:4,9 82:11 85:16,20,25 93:25 94:24 95:17 COO 109:15 copy 3:18 76:5,7 corporation 107:24 108:2 correct 7:19 9:24 9:25 10:6 13:4 15:15 24:2,5,9 30:18,19 40:18 41:17 42:10 45:13 47:2,25 48:5,17 65:14 67:18,23 71:23 72:14 86:10 88:21 90:21 95:11 95:18 104:4 108:17 109:18 116:9,13 corrections 114:5,7 116:13 counsel 102:13 counseling 19:7 COUNTY 116:5 couple 42:5 80:24 course 8:12,20 court 1:2 3:18	110:5 114:19 118:22 covered 81:15 co-packer 110:22 created 28:18 49:19 58:3 117:21 creates 91:4 creating 55:14 57:13 58:19,25 59:10 60:24 81:10 95:23 100:17 csmith@guidepo... 2:19 currently 49:5 111:10	89:19,22,24 101:2 101:8 103:7,12 definite 13:10 demanding 27:4 demeaned 20:5 demeaning 17:21 18:3 37:24 demonstrate 28:23 demoralized 79:17 80:12 demoralizing 82:2 82:6,12 departing 50:6 department 106:10 110:15 departure 35:8 46:25 dependant 14:6 depicted 76:8 depositing 114:15 deposition 3:14 13:22 101:10 103:13 113:9 114:4,13,17,18 depositions 7:3 11:21 DESCRIPTION 117:8,18 detail 28:3 39:15 details 71:10 deteriorated 46:8,9 66:22 deterioration 36:15 39:3 dgrech@gordanr... 2:13 dictate 26:24 dictating 29:2 difficulties 87:23 difficulty 36:18 direct 61:24 62:6 directed 110:5 directly 20:20 112:3 disappointed 81:20 disclosing 8:7	discrimination 14:14,21 15:15,18 20:17 28:23 35:2 35:10 72:20 discriminatory 10:11 16:4,9,21 17:10 discuss 23:16 28:3 48:8 51:12 discussed 36:2 59:12 60:12,16 63:2 95:4 104:9 discussing 66:10 76:18 discussion 11:15 15:23 40:13 51:6 dismissed 35:19,22 dismissive 36:7 disparage 8:23 displayed 38:11 distribution 100:10 DISTRICT 1:2,2 document 14:12 25:12,15 84:18 85:11 103:15 documented 25:5 86:5 documents 5:9,10 doing 19:21 27:12 29:8,10 35:6 91:3 91:8 92:18 96:8 96:13,24 114:9 Dr 9:2,8 17:6 35:5 48:4,9,13,16,20 49:8 102:6,8 112:22 drama 91:4 95:23 100:17 drop 37:12 duly 4:3 118:7	117:17,17,22 118:2,2 earlier 30:4 early 59:20 84:15 90:25 91:17 112:12 East 4:14 EEOC 101:21 102:12,14,20 117:21 effect 3:17 68:18 73:8 effective 7:18 effectively 39:16 46:5 66:5 efforts 49:15,18 either 13:12 77:24 98:12 elevate 55:9 employed 12:14 58:16 employee 6:21 11:8 12:24 13:3,23 14:4 18:14 20:23 21:6,9,15 26:4,8 26:11,19 49:4 78:21 82:12 117:9 117:11 employees 16:14 79:2 80:13 81:25 82:7 110:12 employer 13:8 employment 5:11 7:15,25 8:5,12,20 10:4 11:4 12:9,10 13:9,18 14:10 44:13 45:23 117:9 encountered 19:17 encourages 14:18 endured 35:18 engaged 80:20 engaging 17:18 entire 89:8 entitled 14:12 entrepreneur 104:3 104:7,13
---	--	---	--	--

environment 24:17 24:25 25:10 29:19 29:25 53:25 55:15 57:7,13 58:3,9,20 59:2,11 60:16,25 62:3 117:20 errata 114:7,10,12 114:15 116:15 ESQ 2:6,12,18 essential 39:22 essentially 38:5 39:9 69:20 established 40:21 45:19 estate 106:23 108:19 estimate 40:5 et 105:17 106:24 events 41:10 65:2,6 65:8 66:11 77:15 78:2 96:20 99:12 eventually 96:2 everybody 37:6 everyone's 95:4 exact 25:11 exactly 12:16 42:17 52:13 examination 1:15 3:18 4:7 117:4 examined 4:5 example 37:4 exchange 20:3 22:24 23:20 24:8 53:7 63:20 67:12 68:3,8,21 70:21 71:16 72:17,24 73:24 75:16 76:8 76:12 78:17 80:4 85:8 86:15,23,25 95:13 117:11,12 117:12,13,13 exchanges 68:10 93:2 excuse 91:2 exhibit 6:21 7:2,4 11:4,8 12:4,19	13:6 14:9 20:14 22:24 23:5,9,19 23:24 51:9 53:7 53:12,16 63:20,25 64:5,19 65:23 68:8 72:9 75:16 75:25 76:8,16 77:25 85:3 86:15 86:22 88:7 89:20 100:24 101:3,9,14 101:17 103:8,13 104:18 106:14 117:8 Exhibits 11:19 existence 21:5 expect 31:7 expectation 95:5 expenses 112:14 experienced 39:2 94:7 107:3 experiences 71:21 experiencing 34:16 expert 44:3 explain 18:6 93:19 107:2 explained 54:21 explicit 39:10 express 10:9 18:20 20:4 71:25 72:18 expressed 19:18,23 extension 92:13 extent 22:8 57:22 102:17 109:23 externally 49:21 e-mail 22:24 23:14 23:19,20,23,24 24:12 25:6,21,24 27:3 31:23 38:23 53:7,21 54:2,6,8 54:13,17,21 56:5 56:13,16 58:12 61:13,17,20,23 62:18 63:20 64:10 64:20 65:6,21 66:13,17 67:8,22 68:5,12,14 69:15	71:19 72:8,23 73:23 75:16 76:8 76:11 77:15,22 78:7,9,16 81:19 85:2,3 86:15,22 87:3 88:7 90:11 90:19,23 95:9,13 99:16 117:11,12 117:12,13,13 e-mailing 29:4 e-mails 67:12 68:19	fired 90:9 98:13,17 98:23 firm 2:22 5:2 33:25 first 4:3 9:7 10:16 13:21 23:23 24:12 24:12,23 25:8 45:25 51:4 56:9 57:3 65:23 76:25 77:24 101:24 five-minute 113:2 fixed 13:10 flight 78:11 Floor 2:5,11,17 focus 64:23 65:13 66:18 72:13 95:2 focused 28:21 follow 58:4 102:19 103:4 110:6 following 44:13 45:23 46:25 51:25 follows 4:6 follow-up 62:25 food 112:12 force 3:16 foregoing 118:8 Forgive 77:20 form 3:10 20:23 21:6,10,16 103:8 103:23 104:19 105:14,14,20 106:13 116:14 117:15 formal 55:10 61:25 forth 8:8 19:25 118:7 forwarding 85:7 found 20:24 founders 109:17,20 four 47:16 56:23 60:6,7 61:7 97:9 97:14,24 freak 93:18 freaking 92:24 93:4 93:9,14 94:20 frequency 42:3,6 frequent 28:17	frequently 27:21 friends 80:8 friendship 80:15 front 79:17 80:13 frustration 19:19 full 65:23 66:4,10 furnished 3:19 further 3:9,13 118:10 furthermore 34:7
G				
G 116:2 Gabby 97:15 98:25 99:5 gaming 81:17 gender 9:23 15:15 15:18 28:24 33:12 35:2,10 72:19 86:10 90:16 genuinely 50:12 gestures 5:18 getting 87:23 89:4 Ghodadra 15:21 girlfriend 9:12 girls 56:23 60:6,7 61:7,7 97:9,11,14 give 18:5 31:7 69:24 70:3,18 72:9 given 14:4 30:13 88:4,5 105:8 116:12 118:9 Global 1:8 2:15 5:3 go 4:19,22 13:23 14:9 39:14 59:23 91:8 goal 87:12,16 89:5 going 4:19 5:7 29:3 43:21 46:4 55:24 62:13,16,20 89:18 94:11 100:22 102:19 107:17 109:25 110:2 112:25 113:8 good 4:16,17 44:8				

<p>50:16,18 88:15,22 Gordon 2:9 5:2 Gotcha 37:8 gradually 46:7 great 19:19 47:7 Grech 1:17 2:12 4:8,25 6:17 10:24 22:20 53:3 57:20 63:16 75:13 77:19 84:24 86:12 97:23 100:24 102:17,24 103:3 107:17 109:23 112:25 113:7 117:5 group 44:7 93:17 guarantee 91:10 97:4 guess 5:23 guidance 14:4 guidelines 30:13 Guidepoint 1:8 2:15 5:3,12 7:16 7:22 8:6,14,21,23 9:3,7,9,22 10:17 12:15 13:8,9,17 14:17 15:5,19 21:7 22:16 23:18 26:4,11 30:21,24 33:15 35:2 40:3 40:10 41:25 42:14 44:14,19,25 45:2 45:7,12,24 46:13 49:4,10 58:11,17 65:10 78:20,22 79:2 80:13 81:4,7 82:5 83:12,16,20 103:20,22 105:10 106:3,6 Guidepoint's 12:10 20:24 guy 48:24 </p> <hr/> <p style="text-align: center;">H</p> <p>H 6:18,21 7:2,4,8 7:10 117:7,9 handbook 11:9</p>	<p>12:9,11,14,25 13:3 14:5 117:11 handing 7:6 11:25 23:6 53:13 64:2 75:22 89:20 101:12 103:14 happened 49:24 98:14 harassed 14:20 harassing 16:4,9,21 17:11 harassment 14:13 20:16 head 39:11 50:23 111:4 heads 94:17 healthcare 34:21 39:11 41:20 44:5 77:15,25 81:11 87:13 89:7 96:17 heard 37:12 83:8 93:11 held 1:18 11:16 15:24 40:14 51:7 65:9 help 44:9 hereinbefore 118:7 hierarchy 9:15,18 highly 44:11 hire 28:5 34:5,22 35:4,5 48:9 49:9 HLC 44:3,4 hope 50:12 hostile 37:23 53:24 55:14 57:7,13 58:3,9,20,25 59:11 60:15,24 117:20 hours 27:3 HR 21:16,18 22:4 26:7 48:25 50:23 55:10 human 20:22,25 62:22 hundred 64:24 66:19 72:13 </p>	<p>hurt 79:19</p> <hr/> <p style="text-align: center;">I</p> <p>idea 69:24 80:3 identification 6:22 11:5,10 22:25 53:8 63:21 75:17 86:16 101:5 103:9 110:3,8 117:22 identify 104:2 imagine 59:3 67:21 73:16 94:23 immediately 9:6 74:5 imperative 114:14 impression 45:18 improvement 83:9 83:12,15,19,23 85:22 inability 28:5 34:5 inappropriate 53:23 inbox 58:14 included 14:3 Including 34:13 40:7 income 106:16 incorporated 111:7 increase 34:20 35:12 increasing 36:14 increasingly 36:21 Index 1:6 individual 20:19,20 individuals 14:19 information 8:8,14 informed 47:5 61:23 initiated 93:10 inquire 70:11 instances 82:14 96:12 instructed 34:20 instructions 4:19 4:21 5:4 6:15 114:2 </p>	<p>interact 38:12 interacted 91:21 interacting 26:17 interaction 38:15 38:18 interactions 91:24 interested 118:12 interference 67:9 internally 49:21 internet 20:25 interpret 10:11 interpretation 37:20 interview 48:19 49:23,25 interviewed 44:23 48:16 interviewing 45:8 interviews 49:22 investigated 22:10 investigation 21:22 22:3,9,18 in-person 31:25 32:23 41:13,15 42:9 64:25 65:5,8 91:24 92:4 issue 28:21 76:17 issues 24:16,24 25:9,24 27:17,20 28:2 Item 105:16 106:16 107:10 </p> <hr/> <p style="text-align: center;">J</p> <p>J 1:17 2:12 11:8,20 11:24 12:19,19,21 12:23 13:6 117:10 James 49:2,2 Jessica 17:5 27:12 29:11 46:19 47:23 47:24 56:23,24 59:10 60:4,8 61:6 63:14 76:17,20 77:7,12 78:2,9 79:15,25 81:19 83:22 84:4 86:8 </p>	<p>90:8,10,14 91:15 91:18 92:7,16,25 93:9,14,19,23 94:6 95:25 96:5 96:13,14,19,24 97:2,4 98:7 99:10 100:7 Jessica's 76:24 82:20,22 84:10 85:17 86:5 88:7 94:9 96:7 97:6,24 Jibril 1:4 9:2,8 17:6 35:5 48:4,9,13,16 48:20 49:8 102:6 102:8 112:22 job 28:6 39:13,23 49:20 John 24:19,20,21 25:9,13,19 28:13 31:20 32:2,15 John's 32:6,9 joining 33:25 44:9 44:19,20 Justin 27:15 29:16 48:23 56:22 58:23 58:25 60:3 61:10 63:11 79:17,20,23 80:5,7,11,16,19 81:3,6 </p> <hr/> <p style="text-align: center;">K</p> <p>K 22:21,24 23:5,9 23:19,24 51:9 116:2 117:11 keep 79:16 Kendall 97:16 99:8 Kenko 107:24 108:3,9,13,16 109:5,8,11,14,18 110:9,11,14,23,23 111:5,7,8,19 112:5,19,23 117:23 kind 81:13 KIOKO 104:11,15 107:5,21,23 108:4 </p>
--	--	---	--	---

110:24 111:9,14 kitchen 38:16 knew 31:15 know 5:5 6:5,5,6 7:5,10 11:24 22:5 22:6,8,11 26:10 26:16,20 27:14,22 28:14 33:13 48:13 49:3 52:3,13 54:15 55:4 56:3 62:10 63:6,9,10 63:13,15 65:7 68:9 70:19 73:16 74:17 78:4 79:25 81:13 82:14 83:5 86:7 89:9 94:8 98:16,19,22,24 99:2,5,9 102:4,13 102:16,25 knowledge 22:2,7 27:11,16 48:15 61:11 62:9 83:13 92:15 K-E-N-K-O 108:3	Leah 1:19 118:3,22 leave 91:10 97:3 leaves 90:24 leaving 49:13 91:17 led 28:19 36:16 66:21 left 34:19 35:11 78:10 LEGAL 1:24 letter 90:7 101:4,20 117:15 level 76:22,23 LEVINE 2:22 Liana 34:18 Lichten 2:3,6 6:6 55:24 77:17 84:22 97:18,21 101:21 102:22,25 limited 8:15 line 45:15 65:24 105:16 106:16 107:10 115:4 list 28:4 105:17 listen 18:13 listing 49:19 litigation 102:9 LLC 1:8 2:15 logistics 96:20 long 29:21 111:5 look 7:4,8 11:23 12:18,19 20:14 23:6 24:11 53:13 53:15 64:2,5,18 65:21 75:21 86:21 89:21,23,24 101:11 104:18 106:12 loop 79:16 Los 110:22 losing 67:4 loss 106:19 107:2 107:20 108:15 losses 107:6 108:17 112:5,9 lot 91:11 97:4 loud 18:4	lunch 78:12,15 <hr/> M M 63:17,20,25 64:5 64:19 68:8 72:9 86:22 116:2 117:12 mad 75:5 94:10,13 94:14,17 MAGNA 1:24 main 26:2 45:14 105:14 maintain 80:15 maintained 81:2 makeup 112:9 male 18:13 man 17:16 18:10 management 24:16 24:24 25:9,24 26:5,22 27:17,25 28:2,21 manager 34:9 96:21 mandate 35:4 MANSUKHANI 2:9 manufactured 110:20 March 23:25 24:13 27:18 34:16 52:6 52:14 56:21 59:20 64:19 65:9 68:21 69:14 72:24 77:16 77:18 84:15 87:4 90:20 103:21 mark 6:17 10:24 22:20 53:3 63:16 marked 6:22,25 11:5,9,13,19 22:25 23:4 53:8 53:11 63:21,24 75:17,20 86:16 89:19 101:4,8 103:9,12 marketing 112:18 marks 45:5 67:14	marriage 118:12 matter 44:3 55:10 118:13 mean 29:18 37:3 66:14 89:9 meaning 24:18 97:3 meant 67:5 74:17 89:7 measure 89:7 measured 30:15 measuring 88:17 88:19 meet 87:16 meeting 23:15 31:25 51:17,20,25 52:6,9,17,21 59:13,14,16,19,25 60:13,17,22 61:5 62:11,25 63:3 69:5,6,10,22,25 70:5,7,12 73:20 78:12,15 79:3 92:4 95:3,8,20 99:17,20,24 100:3 100:21 109:9 meetings 27:5 29:5 38:24 41:14,15 59:22 87:10 member 26:25 55:5 members 29:3 47:12 55:11 56:20 58:8,19 60:21 62:7 94:21 95:17 100:22 men 47:18 68:10 mentioned 30:6 38:22 56:12 61:3 mentioning 56:18 mentions 56:10 met 48:10,13 metrics 27:23 30:5 30:8 31:4,24 32:4 32:13,17,21 33:4 33:11 87:20,25 88:3	Miller 1:19 118:3 118:22 mind 25:25 46:18 mine 89:10 misleading 44:12 misplace 74:16 misspelled 87:8 mistreated 9:19,23 86:9 90:15 mistreatment 23:17 moment 7:4 12:19 23:5 53:12 63:25 75:21 87:21 months 24:15,22 29:23 move 6:10 multiple 31:9 M.D 1:4
L L 3:2 4:2,2,2 53:4,7 53:12,16 116:2 117:12 Labor 106:10 lack 27:22 33:9 language 36:15,25 37:16,20 55:13 late 41:2 84:14 90:25 law 2:22 4:25 lawsuit 5:12 LAWYER'S 119:2 lead 35:8 44:3 49:22 leader 40:21 46:5 47:8 leadership 28:18 39:18 40:18 41:20 66:7,14 leading 53:24	<hr/> N N 2:2 3:2 4:2 75:13 75:16,20,25 76:8 76:16 77:25 85:3 88:7 116:2,2 117:2,2,7,13,17 name 4:9 48:25 56:10 73:10 87:8 108:4 names 47:14 nasty 68:18 necessary 72:6 114:5 need 6:4 needed 28:6 never 45:2 49:24 68:17 80:14 New 1:2,11,11,21 2:5,5,11,11,17,17 4:5,15,15 41:13 69:21 70:10 79:12 87:11 91:19 106:9 116:3 118:5 Nick 78:19 nodding 5:18 nondisclosure 8:3			

normally 37:10 Notary 1:20 4:4 116:25 118:4,22 NOTE 119:3 noted 113:14 114:12 116:14 NOTES 119:2 notice 13:13 noticed 77:5 notification 55:10 notified 47:6 notify 20:21 November 1:12 116:8 number 89:2 numbers 33:22 88:23,25 111:3 nutritional 111:18 111:20	officer 3:15 officers 109:13,21 110:8 117:22 okay 6:16 10:23 12:18 13:5 15:13 18:2 29:12 32:2 32:19 33:9 35:15 37:25 38:10,17 41:19 45:6 52:16 53:14 59:24 64:18 66:17 67:11 71:20 74:3 76:3 83:11 87:22 91:15 96:12 98:14 101:20 102:7,22,24 108:15 older 97:18 once 42:4,7 91:22 one-on-one 45:15 operate 104:6 operating 107:6 108:17 112:5 operation 111:6 opinion 34:25 47:6 74:25 88:21 opportunity 7:6 18:6 68:25 69:3 89:24 101:11 Order 1:19 original 114:15 outcome 118:13 output 34:20 overreach 66:25 overtake 65:25 o'clock 51:11	115:4 117:4,8,18 PAGE/LINE 119:3 pain 36:17 paragraph 14:17 20:15,18 24:13 35:15 36:12 39:15 43:22 50:9 56:9 61:22 65:23 101:24 parenthetical 65:24 Park 1:11 2:4,10 part 13:21 29:7 39:12 40:22 97:6 participate 22:17 particular 46:5 88:25 parties 3:6 102:2,9 118:11 partnerships 106:23 108:24 party 13:12 102:5 pattern 44:14 45:24 46:13,15,18 pay 35:12 pending 6:9 people 34:22 47:15 49:24 79:7 perceived 23:16 percent 64:24 65:13 66:19 72:13 perform 28:6 39:23 performance 27:23 30:5,8,14 31:4,24 32:3,13,17,20 33:3,10 83:2,9,11 83:15,19,23 84:11 84:14 85:21 86:2 87:20,24 88:3,11 88:15,18,20 89:8 performed 34:7 performing 84:16 period 8:6 13:10 46:7 59:19 Periodically 81:5 permission 39:10 permitted 48:7	person 50:24 71:12 71:14 personal 107:7 pertained 17:4,5 Peter 101:9 phone 74:9 phrase 93:8,11 physical 36:17 PIP 82:23 83:6 place 1:18 83:18 placed 83:14 85:21 Plaintiff 1:16 117:20 plaintiffs 1:5 2:4 57:21 plaintiff's 101:3 117:14 plan 77:13 83:9,15 83:19,24 85:22 plans 83:12 111:13 Plaza 1:11 2:10 please 4:10,13 5:15 6:18 10:25 14:10 23:6 53:4,13 63:17 64:2 75:13 75:22 82:24 86:22 89:22,23 91:7 114:4,9 point 5:21 6:9 9:18 34:19 50:24 88:18 97:7 102:7 111:11 policies 11:4 14:10 117:10 Pool 16:18,19 19:7 19:10 48:23 53:22 Pool's 19:3 portion 44:6,15 position 44:7 50:2 positive 62:3 possible 62:25 Possibly 95:21 112:2 post 43:14 posted 49:20 practically 90:25 91:8 96:8	Pre 43:14,15 Predating 25:21 premise 46:4 presence 18:17 29:20 30:2 72:5 PRESENT 2:21 pretty 68:18 prevented 35:6 previously 94:6 primarily 66:3 91:19 Prime 110:19 111:25 prior 13:13 18:24 25:6 33:25 42:24 56:24 59:23 61:14 76:6 85:8 Priscilla 22:14 23:15,21,25 24:8 24:19 25:19 28:9 32:18,20 34:3 48:24 49:3 50:12 50:17 51:18,21 52:2,6,7,10,20,23 53:22 54:14,18 55:8 61:18 62:13 62:16,19 63:2 65:22 66:14 67:3 73:23,24 74:4,8 74:10,13 85:4,11 85:16,20,25 87:3 90:20 96:2,4 99:17 100:4,20 Priscilla's 24:25 51:10 74:25 privilege 82:24 privileges 84:6 Probably 42:18 procedure 15:4 procedures 14:13 20:15 produce 95:6 produced 102:18 producing 104:9 product 107:23 108:5 110:17,20
O		P		
O 3:2 86:12,15 89:20,22,24 116:2 117:2,7,13,17 oath 3:16 116:8,11 object 55:25 objections 3:10 obligation 8:22 observed 44:12 occasion 18:12 50:4 occupation 104:3 occur 52:12 69:25 70:8 71:7 occurred 42:4 66:11 74:12 76:12 October 101:3 117:14 offender 14:22 20:20 offenders 15:17 offering 111:20 office 16:13 51:13 71:5 77:2 78:22 78:23 79:12,13,14 87:11 91:19,25 92:5 94:2				

production 57:21 57:24 107:18	R	recollection 100:8 recommendations 49:9 recommended 50:5 record 4:9,13 5:22 11:16 15:24 40:14 51:7 116:10,12 118:8 recruited 43:23 44:2 Rees 2:9 5:2 refer 97:22 reference 24:14 55:18 101:23 referencing 46:14 67:7,9 97:8 referring 66:3 78:3 80:2 reflect 34:25 67:6 104:22 112:13 reflected 34:16 72:19 reflection 105:4 regarding 5:11 51:24 53:22 64:11 related 90:18 118:10 relating 20:3 relationship 50:16 50:18 remember 13:25 33:21 48:25 60:19 61:16 62:14,24 71:10 73:21 79:4 79:8 93:10 99:21 rental 106:22 108:19 repeatedly 30:9 rephrase 5:15 replace 49:15 50:6 replies 81:18 reply 51:10 72:12 82:22 84:17,23 recognize 7:12 12:6 12:21 23:11 53:18 64:7 90:2 103:15	97:9 reportedly 76:25 reporter 1:20 5:19 118:3,22 reporting 14:13 20:16 26:8 56:25 reports 61:24 62:7 represent 5:2 representing 3:20 request 102:15,19 107:11 110:7 requested 86:6 requesting 23:15 require 14:18 required 35:14 reserved 3:11 resolution 50:13 resolve 30:10 resources 20:22,25 62:22 respect 109:25 respective 3:5 respects 17:13 44:24 104:6,14 respond 6:3 responded 19:22 response 32:6 33:6 51:12 70:17 74:14 102:15 responses 5:17,20 rest 5:24 result 31:14 105:9 resurping 67:6 return 106:5 112:20 114:14 returned 70:10 71:4 87:17 92:19 returns 107:8,14 review 12:3 23:9 57:20 77:8 right 6:16 21:19 24:11 28:20 29:5 46:22 49:13 57:3 report 62:13,16 reported 16:24 55:8 56:24 60:8,9	88:8,15 90:2 103:3 role 26:5 32:9 35:11 36:16 39:3 39:8,17 40:22,23 41:3 46:7 66:6,23 67:6 95:4 96:19 routine 34:8 royalties 106:23 108:22 rude 79:19 80:6,12 82:2,6,11 Ruiz 48:23 79:23 rules 4:20 Rutwik 15:20 16:2 26:3,10,21 27:6,9 28:21 29:2,21 31:18 35:24,25 36:23,24 37:9,12 38:20 41:3 43:4,8 55:19,23 56:10 57:8,12 58:4,19 58:25 59:10 60:13 60:24 63:7 67:10 117:21 Rutwik's 29:20 30:2 42:22,23 53:23 57:15 61:4 66:25 67:6 R&D 111:22 112:11,17
question 3:11 5:24 6:3,8,10 8:19 10:13 28:25 67:13 questions 4:21 5:7 5:14 6:12,13 113:12 question-and-ans... 5:6 quit 91:11 97:5 98:7,12,17,18,23 99:6 100:22 quite 92:20 112:10 quotation 45:4 quote 45:20 92:23	Q	remember 13:25 33:21 48:25 60:19 61:16 62:14,24 71:10 73:21 79:4 79:8 93:10 99:21 rental 106:22 108:19 repeatedly 30:9 rephrase 5:15 replace 49:15 50:6 replies 81:18 reply 51:10 72:12 82:22 84:17,23 receiving 12:13 58:17 recess 86:18 113:4 recognize 7:12 12:6 12:21 23:11 53:18 64:7 90:2 103:15	S	

says 61:23 66:18 78:9 82:17 91:13 97:3 schedule 92:8 106:13 107:11,15 107:19 117:22 scheduler 70:16 73:13 SCULLY 2:9 sealing 3:6 Sebag 7:22 10:2,4 10:19 15:20 16:6 16:20 17:2 18:13 18:16 19:3,7,18 19:18,23 20:8 Sebag's 17:8 second 20:15 24:13 52:21 63:3 65:22 76:14 99:20,23 100:3 101:24 105:13 section 8:2 14:12 14:15 21:21,23,24 sectors 81:16 see 13:6,14 14:15 14:25 21:3,21,24 35:20 36:19 39:24 43:22 44:15 47:9 50:14 51:15 55:8 55:16 62:4 64:21 65:3 67:15 78:13 79:21 81:21 83:3 84:12,19 85:5,13 87:5,7,14 91:12 96:7,10 97:2 101:17,23 104:20 105:2,21 106:17 106:20 107:10 seeing 54:6 67:21 68:4 76:15 seek 31:12,18,20 42:19,22,23 43:3 43:5 69:2 seemingly 39:20 65:25 66:8 67:4 seen 54:2 68:9	75:24 76:7 90:4 101:14 segment 46:6 sell 110:17 send 54:13,18 57:11 sending 62:18 sends 67:13 sense 46:20 70:3 111:2 sent 23:15 54:18 57:5 61:17 73:22 101:21 sentence 66:4 101:25 Separate 22:15 41:16 separated 103:19 separation 65:10 81:4 September 7:18 10:8,14 30:22 serious 36:16 serve 44:2 104:13 SERVICES 1:24 session 5:6 set 8:8 92:8 118:7 share 19:10 shared 60:23 sheet 114:7,10,12 114:15 116:15 shortage 34:8,15,25 shorthand 1:20 118:3 shortly 78:6 shouted 37:5 38:3 show 5:8,10 89:18 showed 5:9 43:13 76:5 showing 6:24 11:12 11:18 23:3 53:10 63:23 75:19 76:6 101:7 103:11 106:19 sign 114:9 signed 3:14,17 7:16	7:18,21 10:4,9 116:20 signing 114:11 similar 18:14 simultaneously 34:22 sit 48:12 ski 19:17 75:11 skiing 75:6,9 94:15 slap 82:23 sleeping 36:18 slichten@lichten... 2:7 slope 19:17,20 slopes 20:12 Smith 2:18 78:19 sold 111:3 solely 107:21 108:16 soon 91:10 97:4 sorry 57:9 77:19 84:24 95:10 107:25 sort 5:23 37:19 68:4 sought 27:24 30:7 31:9 32:5 43:23 43:25 47:6 sources 31:10 South 2:4 SOUTHER 1:2 space 114:7 speak 25:8 32:12 32:16 38:4 52:4 52:24 61:18 68:22 70:20 73:19,23 74:3,7 speaking 9:11,14 9:17 37:13 speaks 37:9 specialist 96:18 specific 9:5 30:11 71:9 82:13 specifically 8:2 10:2 14:11 16:24 30:6 50:3 59:5	95:2 specifies 9:10 25:2 32:22 40:4 57:18 59:7 60:18 94:8 98:16 100:11 speculating 55:25 spoke 46:24 47:12 56:15 71:11,13,18 72:16 74:5,6 80:18 88:23 spoken 25:17 52:7 SS 116:4 staff 28:5 34:5,8,15 34:24 stage 41:2 stages 112:12 stand 44:4 start 30:20 46:21 starts 43:22 start-up 44:9,20,25 45:3,4,10 start-ups 45:20 state 1:21 4:4,9,12 106:10 114:6 116:3 118:4 statement 66:20 67:3 77:22 96:7 96:10 STATES 1:2 status 108:12 stay 35:14 steps 51:21,24 STIPULATED 3:4 3:9,13 stop 4:23 stopped 14:24 Street 4:14 stress-induced 36:17 strike 58:23 59:17 structure 30:8,14 33:14,16 Stuart 2:6 4:23 77:21 subject 44:2 78:16 93:16,20,24 110:4	114:11 117:23 subjected 14:20 submit 20:23 21:9 21:15 submitted 106:4 subscribed 116:20 substance 116:14 suffered 112:4 suggest 82:23 supervisor 16:15 16:16 20:22 21:10 21:12 31:16 76:20 supposed 49:23 sure 12:16 57:10 58:13,15 66:16 72:22 77:4 surprised 81:20 surrounding 27:23 60:20 surveys 45:17 sworn 3:15,17 4:4 118:7 system 26:13,15 S-corporation 107:5,22 108:10 S-corporations 106:24
T				
				T 3:2,2 4:2,2,2 115:2 116:2 117:2 117:7,17 118:2,2 take 5:19 6:11 7:3 12:19 23:5 26:5 26:22 40:9 53:12 63:25 64:25 75:21 78:11 82:24 84:5 89:22,23 94:12 101:11 113:2 taken 1:16,19 39:17 40:2,17 51:24 66:6 77:13 86:19 113:5 116:7 talk 18:13 31:22 32:3,20 38:4 47:23 68:11,13

100:6,9,13,16	43:16 64:14 65:18	24:23 25:23 26:3	turned 102:23	32:1 33:1 34:1
talked 18:7 28:20	66:12 69:15,19	26:15 29:22 36:8	twice 91:22	35:1 36:1 37:1
29:2 30:4 34:4	tell 14:22 16:2,6,7	41:7 43:13 46:7	two 8:21 42:18,20	38:1 39:1 40:1
41:6 46:10 47:16	20:11 43:11 44:24	51:14 58:16 64:14	42:24 67:11 79:6	41:1 42:1 43:1
47:24 49:12 52:20	51:21 55:3 56:6	67:18 76:14 80:18	79:11 90:17 94:17	44:1 45:1 46:1
57:2 62:8 63:3	61:12,13 62:15,19	86:19 103:23	U	47:1 48:1 49:1
73:2,5 87:22	69:12 71:15 73:6	109:16 111:21	U 3:2 117:17	50:1 51:1 52:1
90:11 100:2	74:10 94:4 100:20	113:11,14	Uh-huh 10:15	53:1 54:1 55:1
talking 34:10 35:16	temporarily 82:25	times 42:5,8 57:15	102:3	56:1 57:1 58:1
46:21 88:6 95:8	tenure 40:3	93:12	ultimately 51:17	59:1 60:1 61:1
95:12 99:16	term 13:10	timing 54:15	70:7	62:1 63:1 64:1
talks 48:3	terminated 13:11	tips 105:17 106:2	unable 34:22	65:1 66:1 67:1
taught 35:3	99:6	today 5:11 48:12	uncalled 79:18	68:1 69:1 70:1
tax 103:18 106:4	termination 9:3,7,9	51:11,12 54:3,6	uncommon 74:15	71:1 72:1 73:1
107:8,14 112:19	14:5 90:21 105:9	78:10 80:16 109:5	understand 5:13	74:1 75:1 76:1
team 13:24 14:7	terms 42:6 111:21	told 16:19 43:6,7	10:13 13:7 28:25	77:1 78:1 79:1
24:17 26:6,23,25	testified 4:5	44:8 65:12 69:4,9	80:1 81:1 82:1	80:1 81:1 82:1
29:3,14 44:10	testifying 3:20	69:19 74:11 92:23	83:1 84:1 85:1	83:1 84:1 85:1
45:3,9,10,16,17	testimony 13:20	93:15,23	understanding	86:1 87:1 88:1
46:25 47:5,12	18:25 116:7,11	tomorrow 78:12	31:3,5,8,11 54:11	89:1 90:1 91:1
55:5,11 56:21	118:6,9	87:11	74:20 93:13	92:1 93:1 94:1
58:8,19 59:13,14	text 13:5	tone 18:5 37:23	understood 58:15	95:1 96:1 97:1
59:22 60:2,16,21	thank 15:13 41:15	38:2	unemployment	98:1 99:1 100:1
60:23 61:3,5 62:7	51:14 77:21	top 111:4	104:23 105:5	101:1 102:1 103:1
62:11,12,15 79:18	113:10,13	toxic 24:16,24	106:10	104:1 105:1 106:1
89:8 91:5,11 92:6	thanks 81:19	25:10 29:18,25	Unit 4:14	107:1 108:1 109:1
92:21 93:5,6	thing 16:7 61:15	trajectory 44:13	UNITED 1:2	110:1 111:1 112:1
94:12,18,21,25	82:15	45:23 46:2	units 111:3	113:1
95:3,7,17,20,23	things 19:12 27:4	transcript 5:20,22	unjustified 36:15	vacation 19:22
97:5,6,25 99:12	40:25 90:17	6:2 114:17,18	unquote 92:23	vacationing 19:4
100:10,18,22	think 26:2 31:15	116:7,9 118:8	unstable 67:24	vacations 19:8,13
teammate 59:3	68:6 73:6 78:2	transferred 56:25	unwelcome 14:23	vacuum 28:18
teams 45:7,11,19	79:19 82:13	travel 39:7 41:10	use 8:13 36:24	Valentia 1:4,16
tech 81:16	third 65:24 106:14	41:12 82:25 84:5	37:15	4:11 87:9 90:24
technically 97:9	thirty 114:16	traveling 39:22	utter 37:21	116:6,18 117:3
teleconference	thought 81:25	treated 46:16	V	Valentia's 88:11
41:17 42:11	threat 83:18	trial 1:15 3:12	V 4:1,2,2 5:1 6:1	Valentina 87:9
teleconferences	threatening 53:24	trip 17:10 18:24	7:1 8:1 9:1 10:1	varied 42:7
39:21 41:8,21,23	55:13	42:14 59:15 64:11	11:1 12:1 13:1	variety 81:16
42:13,21 43:9	three 8:18 40:6	71:8,22 72:4	14:1 15:1 16:1	various 60:21
64:24 65:14,20	42:8,18,20,24	75:11 78:5 89:13	17:1 18:1 19:1	verbal 5:17
66:2,9,15,19,23	47:16	trips 40:2,9	20:1 21:1 22:1	verbally 55:12
67:2,5 72:14	three-week 34:13	true 116:9,12 118:8	23:1 24:1 25:1	versus 41:8
87:12,13 89:3,4,6	time 1:18 3:11 5:9	trusts 106:24 109:2	26:1 27:1 28:1	Villetti 1:4,16 4:1
89:11	6:4 8:13 15:9,11	turn 7:24 51:3	29:1 30:1 31:1	4:11,16 5:1 6:1,24
telephone 38:7	19:2 21:2 23:24	105:13		7:1,24 8:1,4 9:1

10:1 11:1,12 12:1 13:1 14:1 15:1 16:1 17:1 18:1 19:1 20:1 21:1,3 22:1 23:1,3,8 24:1 25:1 26:1 27:1 28:1 29:1 30:1 31:1 32:1 33:1 34:1 35:1 36:1 37:1 38:1 39:1 40:1 41:1 42:1 43:1 44:1 45:1 46:1 47:1 48:1 49:1 50:1 51:1 52:1 53:1,10 54:1 55:1 56:1 57:1,25 58:1,6 59:1 60:1 61:1 62:1 63:1,23 64:1,4 65:1 66:1 67:1 68:1 69:1 70:1 71:1 72:1 73:1 74:1 75:1,19 75:24 76:1 77:1 77:12 78:1 79:1 79:16 80:1 81:1 82:1 83:1,5 84:1 85:1 86:1,21 87:1 88:1 89:1,18 90:1 91:1 92:1 93:1 94:1 95:1 96:1 97:1 98:1 99:1 100:1 101:1,7 102:1 103:1,11 104:1,17 105:1,12 106:1,12 107:1 108:1 109:1 110:1 111:1 112:1 113:1 113:8 116:6,18 117:3 voice 20:12 VSB 1:6	want 54:9 113:10 wanted 35:5 55:4 wasn't 26:16 42:10 58:10 67:7 68:24 88:5 way 25:16 27:6,9 28:22 31:22 33:11 34:24 37:9,25 39:5 46:9 65:16 68:7 77:7 84:18 85:12 118:12 ways 18:2 26:21 35:25 38:20 40:20 website 110:18 112:3 week 42:4,7,8 87:13 89:6,12,17 91:22,22 92:5 weeks 80:25 went 19:25 witness 3:20 4:3 7:7 12:2,20 19:6 23:7 64:3 75:23 97:20 110:10 113:13 114:2 117:3 Witness(es) 118:6,9 woman 29:9 68:8 73:7 91:8 women 9:19 10:12 10:21 23:17 46:16 46:17 47:18,19,20 68:10 97:22,24 98:3 work 11:22 24:16 24:24 25:10 29:19 29:25 40:10 51:11 53:25 55:14 57:7 57:13 58:3,9,20 59:2,11 60:15,24 62:3 77:6,8 87:11 90:24 91:3,5,9 92:18 95:2 96:8 96:13,15,24 100:9 109:4 117:20 worked 15:4 103:23	working 91:18 104:8 wouldn't 35:12 wrath 93:16,20,24 94:7 writes 87:7 writing 25:7,14,23 57:12,17 58:5 102:20 103:4 110:3,6 117:23 written 55:12 57:5 57:24 58:7,18 117:19 wrong 95:11 wrote 46:18 90:19 www.MagnaLS.c... 1:25 W-2 103:23 105:20 106:5	1 1 14:17 64:19 105:16 106:13 1B 4:14 1st 64:19 65:9 68:21 69:14 72:24 77:16,18 87:4 1.5 87:12 89:5,16 100 65:13 10004 2:11 10010 2:17 10016 2:5 10065 4:15 101 117:14 102 117:21 10200 1:6 103 117:15 1040 103:8 105:13 106:13 117:15 107 117:22 1099s 106:8 1099-G 104:19 106:9 x 1:3,10 117:2,7,7 117:17
W		X	3 3 51:11 3:00 78:10 30 114:16 387 2:4
W 116:2 117:2 wages 105:17 106:2 waived 3:8		Y Yamin 34:18 Yamin's 35:8 yeah 89:17 years 8:21 yell 38:24 York 1:2,11,11,21 2:5,5,11,11,17,17 4:5,15,15 41:13 69:21 70:10 79:12 87:11 91:19 106:9 116:3 118:5	4 4 117:5 4:48 113:14
		Z zoom 93:17	5 5 8:2,9 5th 2:5 53 117:12 57 117:19
		\$ \$10,005 104:25 \$19,835 106:19 107:3,20 112:4 \$56,359 105:23	6 6 117:9 61st 4:14 63 117:12 646-588-4872 2:6 675 2:16
			7 7 8:18

75 117:13

8

86 117:13

866)624-6221 1:24

9

9:23 24:2